

August 26, 2013

Mr. Robert deV. Frierson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, DC 20551

Re: FR Y-14A, FR Y-14Q, and FR Y-14M

Dear Mr. Frierson:

The Financial Services Roundtable¹ and The Clearing House Association L.L.C.² (collectively the “Associations”) appreciate the opportunity to comment on the Federal Reserve Board’s (the “Board”) proposed schedules and instructions for forms FR Y-14A, FR Y-14Q, and FR Y-14M. Our comments and recommendations are intended to enhance the quality, utility, and clarity of the information that is collected by these forms, and to minimize the burden on reporting companies. We also believe that our recommendations will reduce the supervisory burden on Board and Federal Reserve Bank personnel. Our comments and recommendations are divided into four sections:

- Communications between Board and Reserve Bank personnel and reporting companies;
- Edit checks;
Reporting deadlines; and
- Proposed changes to the Wholesale Corporate Loan and Securities Schedules.

¹ The Financial Services Roundtable represents 100 integrated financial services companies providing banking, insurance, and investment products and services to the American consumer. Member companies participate through the Chief Executive Officer and other senior executives nominated by the CEO. Roundtable member companies provide fuel for America's economic engine, accounting directly for \$98.4 trillion in managed assets, \$1.1 trillion in revenue, and 2.4 million jobs.

² Established in 1853, The Clearing House is the oldest banking association and payments company in the U.S. It is owned by the world's largest commercial banks, which collectively employ over 2 million people and hold more than half of all U.S. deposits. The Clearing House Association L.L.C. is a nonpartisan advocacy organization representing—through regulatory comment letters, amicus briefs and white papers—the interests of its owner banks on a variety of systemically important banking issues. Its affiliate, The Clearing House Payments Company L.L.C., provides payment, clearing, and settlement services to its member banks and other financial institutions, clearing almost \$2 trillion daily and representing nearly half of the automated-clearing-house, funds-transfer, and check-image payments made in the U.S. See The Clearing House's web page at www.theclearinghouse.org.

Communications Between Board and Reserve Bank Personnel and Reporting Companies

Reporting companies often have found it difficult to obtain guidance on the FR Y-14 worksheets. Currently, guidance is provided primarily through an FAQ process. This process, however, provides no acknowledgment of the receipt of a question, requires reporting companies to scroll through hundreds of responses to determine if a question posed by the company has been addressed, and often simply restates instructions without any further guidance or interpretation.

In order to enhance the quality, utility, and clarity of the information that is collected by these forms and minimize the burden on reporting companies, we recommend the following enhancements to communications between Board and Federal Reserve Bank personnel and reporting companies:

- Supplement the FAQ process with the designation of a specific contact person for each sub-category of FR Y-14 data as shown in the illustration on page 5 of Attachment A. As the illustration indicates, we find that FR Y-14 questions fall into three subject areas and take three forms: general questions, technical questions and specific data questions. We recommend that the Board and each of the Federal Reserve Banks designate someone in each of the three subject areas to serve as a point of contact for FR Y-14 questions.
- Establish a repository of the most common questions and responses that can be searched by reporting companies. Reporting companies would view this repository as a “first point of access” in trying to address compliance questions.
- Establish a timeline for addressing questions submitted by reporting companies. This would help to ensure that reported data is reported correctly.
- Integrate settled FAQs into the instructions.

Edit Checks

Failed edit checks diminish the utility of data submitted to the Board. We recently undertook an analysis of failed edit checks within the various reporting schedules. We found that the failures fell into two general categories: (1) Edit Checks in Question, which are failures caused by illogical edit checks, failures caused by low tolerance levels, and failures caused by a valid business reason; and (2) Data Gaps, which are failed edit checks caused by a lack of data.

Attachment B lists 103 edit checks that fall into these two categories. In each instance, the Attachment explains the failure and recommends a solution. In many cases, the solution is to increase the tolerance level on the data. Relatively minor adjustments in

tolerance levels would eliminate much of the edit check problems, without compromising the quality of the data submitted to the Board.

Deadlines

We believe that the quality, utility, and clarity of the information reported on the FR Y-14 forms would be enhanced by some modifications in the filing deadlines and time frames for implementing changes initiated by the Board (final instructions) and for the reporting of data of recently acquired portfolios. Toward that end, we recommend:

- A one week lag period between the FR Y-9 and FR Y-14 submissions;
- The establishment of a six month period from the date final instructions are published in the Federal Register for all filers to comply with changes;
- A one year period for reporting companies to incorporate acquisition data into reports; and
- The establishment of time limits for the provision of historical data on acquired portfolios, e.g., no more than 5 years.

Each of these recommendations is discussed in greater detail below.

Aligning the FR Y-9 and FR Y-14 Submissions

Bank holding companies have been filing FR Y-9C reports since the late 1970s. Since then, reporting companies have implemented internal control processes to ensure the accuracy and completeness of the data included in the FR Y-9C reports. Currently, however, the FR Y-14 schedules must be filed on the same day as the FR Y-9C reports, and must be reconciled against the FR Y-9C filing. This same-day reporting requirement not only creates a compliance challenge for reporting companies, but can compromise the quality of the data submitted.

We agree that it is a sound practice for companies to reconcile the FR Y-14 to the FR Y-9C reports. However, having these two reports due on the same day causes significant challenges to reporting companies. Oftentimes the FR Y-14 reports must wait for the final balance from the FR Y-9C report for reconciling and research purposes. Moreover, in many cases both FR Y-9C and FR Y-14 reports rely on the same source data providers and the same subject matter experts. A reasonable lead time of one week between these two reporting dates would accomplish much to reduce these problems and improve the quality of FR Y-14 reporting overall.

Change Requests

The System Development Lifecycle (“SDLC”) process is an industry accepted methodology to ensure that data changes are implemented in an appropriate manner. This process involves a thorough analysis to support the accurate delivery of the new data request; formal documentation, reviews, and approvals; data extract programing, including schedules, error checking controls, and data validations; and appropriate testing cycles.

Currently, however, change requests can result in a reporting company not having sufficient time to implement the SDLC process. This occurs for a number of reasons, including ambiguity in a new data request, which takes time to interpret; requirements that are not communicated to reporting companies via a consistent format (e.g., verbal or FAQs); data requirements that are conflicting across schedules or within the same schedule; and delays in the publication of edit check rules. Moreover, as change requests occur further along in the SDLC process, it becomes increasingly challenging for reporting companies to maintain the internal control and governance processes that are so critically important to supervisors and the reporting companies to ensure the accuracy of the data reported.

The charts on pages 13 to 17 of Attachment B illustrate some average and actual SDLC time frames related to change requests. The chart on page 13 of Attachment B displays an approximate percentage of time required for each phase of a standard SDLC process based on industry averages.

The charts on pages 14 and 15 of Attachment B show the average time required, in percentage terms, for the different SDLC processes conducted in connection with FR Y-14 Q and M change requests.

Finally, the chart on page 17 of Attachment B shows the actual time, in weeks, for one reporting company to produce a single counterparty gross credit exposure report using a specific data metric.

Based upon this data, we recommend that the Board establish a 6-month lag for all filers between the time when a final instruction is published in the Federal Register to the compliance deadline.

Acquisition Data – Future

Data from acquired portfolios must be integrated into current systems or pulled separately and consolidated for data submission. This requires a significant amount of resources, often within a short period of time. A sample timeline appears on page 18 of Attachment A. To ensure that the data reported on the FR Y-14 forms is accurate, we

recommend that reporting companies have a timeline of one year for submitting data after the close date of an acquisition.

Acquisition Data – Historic

At the time of an acquisition, the specific data available is not often known and communication is limited throughout the acquisition process. While purchase accounting provides a “clean slate” for the acquired business(es) from a U.S. generally accepted accounting principles (“GAAP”) perspective, the resulting fair value and ASC 310-30 adjustments provide little information for the acquirer in converting historical data for the acquired business. FR Y-14 reporting teams are left to scavenge old systems and data marts for acquired bank historical data when data of the acquired bank is merged on the acquirer’s systems. This can be quite costly and time consuming. Additionally, many acquired institutions are the result of acquisitions they themselves made. This creates a multiplication effect in terms of historical data challenges. Smaller acquired institutions often used service providers for their data needs and the contracts with these providers typically did not require the maintenance of history sufficient to meet FR Y-14 requirements.

We recommend a time limit on the requirement for all filers providing historical data on acquired portfolios to data available in the acquired portfolio (e.g., a maximum of five years prior to the acquisition date). We also recommend that additional time and tolerance should be given to all filers to comply with “origination” field requirements. These items could be potentially explained in supplemental schedules.

Proposed Changes to Wholesale Corporate Loan and Securities Schedules

We have comments on the Wholesale Corporate Loan Schedule and the Securities Schedule.

Wholesale Corporate Loan Schedule

For the Wholesale Corporate Loan Schedule, the Board proposes to “add one item to identify borrowers that are special purpose entities, which would enhance the ability of the Federal Reserve to identify loans with specific characteristics that vary greatly from the aggregate.” Heretofore, reporting firms have not had a business need to identify borrowers as special purpose entities on multiple source accounting systems. If this identifier is required as proposed, firms would have to go into the actual (paper or scanned) loan documentation files for thousands of obligations to determine whether the obligor is a special purpose entity. To avoid this burden, we urge the Board to reconsider whether the benefits of identifying such loans outweighs the cost to obtain this information. If this identifier is deemed to be necessary, we request that the Board postpone the effective date

for at least six months so that institutions can first obtain the data and then formulate its collection into existing processes.

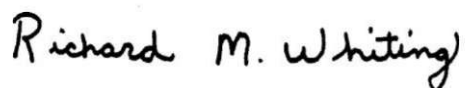
Securities Schedule

For the Securities Schedule, the Board proposes adding Book Yield and Purchase Date as columns to the Securities 1 worksheet, noting that "The proposed changes would enhance the ability of the Federal Reserve to model the behavior of the proposed security type, which varies greatly from the aggregate and allow the Federal Reserve to more accurately track the changes in the portfolios of respondents." Regarding the Purchase Date, it is unclear as to whether trade or settlement date should be reported. For purposes of determining Book Yield, various methods can be used, each of which has its own advantages and drawbacks. For debt instruments, these methods include, but are not limited to, projecting cash flows and solving for the yield that equates the present value of the projected cash flows to current book value. For equity instruments, the methods include annualizing the current dividend relative to the current book value. Also, since there is no accrued interest for equity securities (i.e., perpetual preferred stock) based upon U.S. GAAP, it is unclear how to complete the field for Book Yield. To eliminate these ambiguities, we recommend that the instructions for the proposed columns on the Securities 1 worksheet should clearly state the required or acceptable approaches to reporting these added elements, and consideration should be given to leaving the Book Yield field blank for equity securities.

Conclusion

In summary, the Associations believe that recommendations contained in this letter would enhance the quality of the data the Board receives through the FR Y-14 reports and reduce the reporting burden for reporting companies and the supervisory burden for the Board and the Federal Reserve Banks. For questions or for further information on the matters addressed in this letter, please contact Richard Foster, Senior Counsel for Regulatory and Legal Affairs, The Financial Services Roundtable (202-589-2424 or richard.foster@fsround.org) or Ryan Pozin, Assistant Vice President, Finance, The Clearing House (212-613-0135 or Ryan.Pozin@theclearinghouse.org).

Sincerely,



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The Financial Services Roundtable



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DISCUSSION GUIDE FOR FRY-14 DATA SUBMISSIONS

Communication Standards
Deadlines / Timelines
Edit Checks

Federal Reserve / Financial Service Industry
Council Working Meeting
August 6, 2013

THE FINANCIAL SERVICES ROUNDTABLE

Financing America's Economy



Agenda

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Progress To Date

- **Meetings with the Federal Reserve**

- FSIC Members and the Federal Reserve met on April 8th and April 19th to discuss initial themes and recommendations regarding the FRY-14 data submission.
- Both groups agreed to an ongoing dialogue to improve the current process.

- **Current Discussion**

- Discussion is focused on the three key themes previously highlighted:
 - Communication Standards
 - Deadlines / Timelines
 - Edit Checks





Objectives for this Meeting

To be Accomplished during this Meeting:

- Collaborative discussion
- Identify / agree on the issues to actively pursue
- Reach consensus on approach to resolve or address issues

To be Accomplished Subsequent to this Meeting:

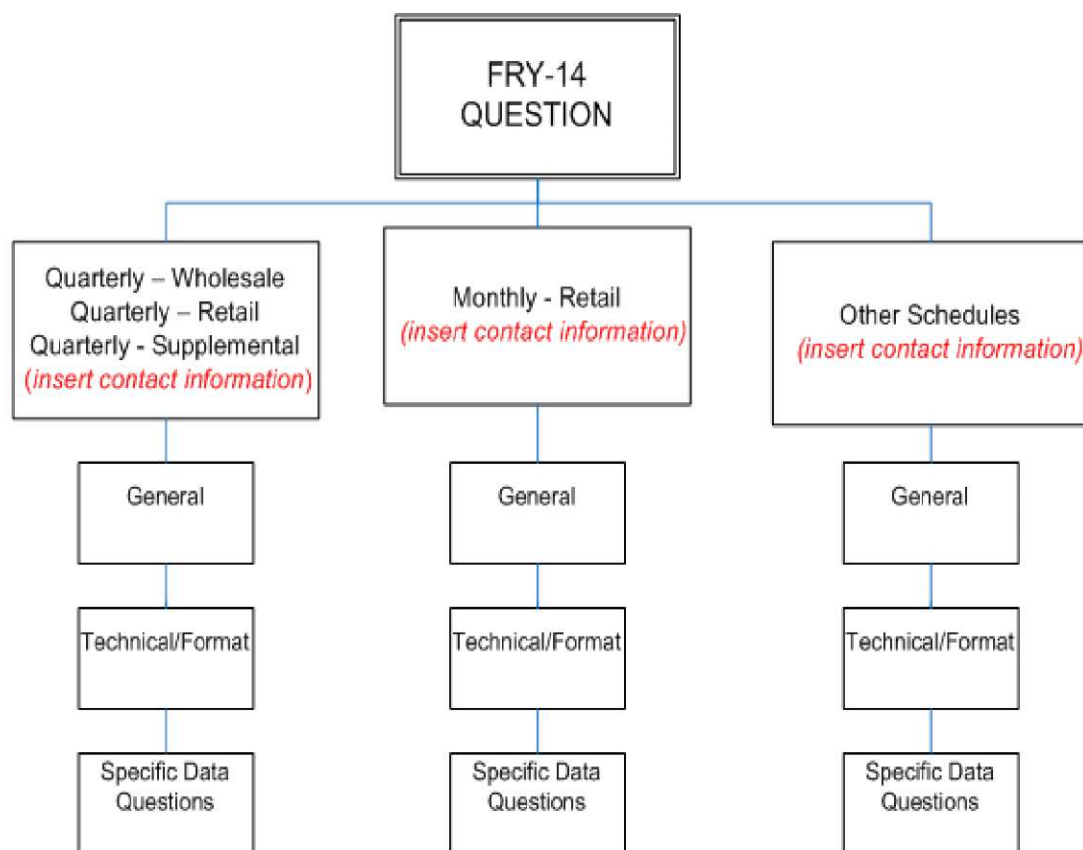
- Determine and coordinate the appropriate meeting schedule, action plans, roles and responsibilities, and timelines



Communication Standards

Summary:

- To facilitate conversation with the appropriate personnel at the Federal Reserve, FSIC Members are requesting that the Federal Reserve implement a more effective communication process around question handling. One approach might be identifying a contact person for each sub-category of FRY-14 as diagrammed below.



General Questions - Examples

We need to restate Y14Q Historical PPNR schedule due to a mistake found. What is the resubmission requirement? Should we provide a supplement explanation document?

Technical Questions - Examples

Y14Q Operational Loss schedule: There are estimated two million records that will be included in the upcoming schedule. A spreadsheet format does not seem practical. (Note this question was answered in the FAQ document later. We rarely have technical questions with Y14Q.)

Specific Data Questions - Examples

Y14Q MSR schedule: When defining buckets (e.g., FHLMC/FNMA 30 yrs.), should that include all loans typically pooled with 30-year loans, such as Fix 25, 20, etc.?

HPI & Unemployment - are these meant to represent lifetime changes to these economic variables or only for a period of time?



Communication Standards – Additional Considerations

General Considerations – Repository and Timeframe for Responses

Consideration: Repository of questions and responses

Recommendation: Establish a repository to publish generic questions and responses; as a proposed solution, responses could be incorporated into the FAQs

Consideration: Timing of responses

Recommendation: Establish a timeline for resolution for inquiries submitted to the Federal Reserve

Considerations Specific to the Edit Check Process

Consideration: Perform a re-evaluation of low or zero tolerance levels and allow for a generic response section

Recommendation: Add a generic response section and/or change tolerance levels / acceptable data responses to mitigate subsequent questions and follow up from the Federal Reserve

Consideration: Recurring failed edit checks for which valid business reasons exist

Examples: Commercial Real Estate and C&I (Wholesale)

- Edit Check (CRE): NetOperatingIncome should not be negative
- Explanation: Net Operating Income can be negative
- Edit Check (CRE): 30 year amortization DSC is greater than 200
- Explanation: A DSC greater than 200 is possible for loans that are nearing payoff
- Edit Check (C&I): If PastDue (field 32) is 120 days or over for the credit facility then NonAccrualDate (field 33) should not have a value of 9999-12-31
- Explanation: The data includes past due acquired loans and certain matured loans that are not reported as non-accrual per accounting rules
- Edit Check (C&I): 174: The sum of CurrentAssetsCurrent (field 66) and FixedAssets (field 69) should not exceed TangibleAssets (field 68)
- Explanation: This is a result of negative balance sheet values which are normal as part of business operations

Recommendation: Recurring failed edit checks should be tracked and resolved. Additionally, the level of detail for responses should be defined at the line versus loan level



Edit Checks – Summary

A sub-committee of the FSIC was organized to identify and analyze failed edit checks within the various reporting schedules. The results of the review are categorized by reporting schedule and edit check issue – “Edit Check in Question” or “Data Gap”. Edit Checks in Question identify illogical edit checks, edit checks with low tolerance levels, or failed edit checks supported by valid business reasons. Data gaps identify failed edit checks resulting from a lack of data. This data is generally not obtained or acquired by the bank, however is required per the schedule.

The sub-committee identified 103 Edit Checks in Question and an additional 51 Data Gaps.

The tables below provide examples of Edit Checks in Question and Data Gaps identified for each schedule. The full list of detailed edit checks is provided via material supplemental to this presentation (FSIC Edit Check Review_Detailed Support.xlsx).

Corporate Schedule – 20 Edit Checks in Question and 20 Data Gaps

Edit Number	Edit Check Issue	Edit Test	Justification / Explanation
8	Data Gap	Original Internal Obligor ID must not be null or zero	Some core banking systems do not have an "ObligorID," therefore, this is a legitimate data gap.
55	Edit Check in Question	Committed Exposure must not be null or negative	Some transactions can have negative commitments (Syndications and/or Participations).
174	Edit Check in Question	TangibleAssets should be greater than or equal to the sum of Current Assets Current and Fixed Assets	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the edit checks.
189	Edit Check in Question	If NonAccrualDate is not equal to 9999-12-31, then NonAccrualDate should be prior to the MaturityDate	It is standard business practice for a loan to be placed on non accrual status after the maturity date. Non accrual date can be after maturity date if the borrower continues to pay interest after maturity or loan is in workout.
331	Edit Check in Question	Total Assets Prior Year should be greater than or equal to Current Assets Prior Year	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.



CRE Schedule – 17 Edit Checks in Question and 20 Data Gaps

Edit Number	Edit Check Issue	Edit Test	Justification / Explanation
15	Edit Check in Question	Committed Balance must be positive numeric and a whole number	Some transactions can have negative commitments (Syndications and/or Participations).
66	Data Gap	Current Occupancy must be provided and (≥ 0 and ≤ 1) or NA	This data may not be obtained through normal business processes or additional tolerance should be given to the data required.
112	Edit Check in Question	Outstanding Balance must not be multiple of 10 from prior quarter. For example, the prior quarter was 10 and the current quarter was 100. $100 / 10 = 10$	Large balance changes (greater than a multiple of 10) may occur when the prior quarter balance was small.
156	Data Gap	Property Size must be (numeric and a whole number) or NA	This data may not be obtained through normal business processes or additional tolerance should be given to the data required.
157	Edit Check in Question	If the current Origination Date is the same as prior quarter, then current Property Size must equal to prior quarter	Edit check should allow tolerance for instances when re-appraisal reflects that the property size has changed.

USSB Schedule – 7 Edit Checks in Question and 1 Data Gap

Edit Number	Edit Check Issue	Edit Test	Justification / Explanation
35	Edit Check in Question	D_COMMITMENTS must not be negative	Since the commitment is linked to the balance, if the D_OS is negative than the D_COMMITMENTS will also be negative. An account may overpay or have a credit applied to the account and show as a negative outstanding balance amount.
39	Edit Check in Question	D_GROSS_CONTRACTUAL_CO must not be negative	Negative charge-off and recovery values can result from several actions. An account that has gone to charge-off can be brought out of charge-off with a manual reversal entry, causing a negative charge-off. Manual reversal entries can occur if a customer pays on the loan after it has gone to charge-off.
34	Edit Check in Question	D_OS must be greater than or equal to D_NEW_ACCOUNTS	An account may charge new volume and return or pay it down in the same month, which makes the D_New_Accounts greater than D_OS.
24	Edit Check in Question	D_OS must not be negative	An account may overpay, have a credit applied to the account, or be guaranteed and show as a negative outstanding account balance.
26	Edit Check in Question	If N_ACCT is greater than zero, then D_OS must be equal or greater than zero	An account may overpay or have a credit applied to the account and show as a negative outstanding account balance.



USOthCons Schedule – 6 Edit Checks in Question and 1 Data Gap

Edit Number	Edit Check Issue	Edit Test	Justification / Explanation
33	Edit Check in Question	If N_ACCT is greater than zero, then D_OS must be greater than zero	Revolving accounts within the U.S. Other Consumer population are commonly active but may have a \$0 balance.
31	Edit Check in Question	D_OS must not be negative	Segments with a small number of loans can have a negative balance due to customer over-payments.
33	Edit Check in Question	If N_ACCT is greater than zero, then D_OS must be greater than zero	Revolving Accounts can be open and active but have a current zero outstanding balance.
43	Edit Check in Question	D_RECOVERIES must not be negative	Negative charge-off and recovery values can result from several actions. An account that has gone to charge-off can be brought out of charge-off with a manual reversal entry, causing a negative charge-off. Manual reversal entries can occur if a customer pays on the loan after it has gone to charge-off.
-	Data Gap	If N_NEW_ACCOUNTS is greater than zero, then D_NEW_COMMITMENTS must be greater than zero	This data may not be obtained through normal business processes or additional tolerance should be given to the data required.

Auto Schedule – 33 Edit Checks in Question

Edit Number	Edit Check Issue	Edit Test	Justification / Explanation
42	Edit Check in Question	D_OS must not be negative	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.
44	Edit Check in Question	If N_ACCT is greater than zero, then D_OS must be greater than zero	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.
46	Edit Check in Question	D_OS must be greater than or equal to the sum of D_ORIG_TERM_LE_48, D_ORIG_TERM_49_60, D_ORIG_TERM_61_72 and D_ORIG_TERM_G_72	Edit fails if the sum of the components of off on the 6th place to right of the decimal. This outage is due to rounding.
67	Edit Check in Question	If N_ACCT is equal to null or zero, then D_REPO must equal null or zero	Since repos are not considered active loans, the N_ACCT can be zero and D_REPO positive.
111	Edit Check in Question	D_OS must be greater than or equal to D_JOINT_APPLICATION	Some loans in the segment could have negative balances, making the D_JOINT_APPLICATION greater than the total D_OS in segment.



Home Equity Schedule – 3 Edit Checks in Question and 10 Data Gaps

Edit Number	Edit Check Issue	Edit Test	Justification / Explanation
8	Data Gap	Original Property Value must be a valid positive whole number	This data may not be obtained through normal business processes or additional tolerance should be given to the data required.
11	Data Gap	Original Backend DTI must be a valid positive whole number	This data may not be obtained through normal business processes or additional tolerance should be given to the data required.
13	Data Gap	Original FICO must be a valid whole number between 300 and 899	This data may not be obtained through normal business processes or additional tolerance should be given to the data required.
41	Edit Check in Question	Current Interest Rate – The annual percentage rate of the loan as of the last day of the reporting month	Interest Rates may exist that does not fall within this guideline (non-accrual rates, promotional rates, etc.).
75	Edit Check in Question	Loan Extension must be "Y", "N" for loans and blank for lines of credit, and "N" for Modifications with Term Extensions	Per discussion with LPS, this is a problem with the edit report logic.

First Lien Schedule – 15 Edit Checks in Question and 1 Data Gap

Edit Number	Edit Check Issue	Edit Test	Justification / Explanation
13	Edit Check in Question	Original FICO must be a valid whole number between 300 and 899	These are primarily converted accounts where this information was not available on the legacy system.
20.1	Edit Check in Question	Purpose of Loan coded Unknown cannot exceed 5% of reported portfolio loans	These are primarily converted accts where this information was not available on the legacy system. Research is underway to determine if additional data can be used to lower the unknown category.
21.1	Edit Check in Question	Number of Units coded Unknown cannot exceed 5% of reported portfolio loans	These are primarily loans where we can not determine the number of units as defined by the instructions. There are also old loans where no information is available to determine number of units.
37	Edit Check in Question	ARM Lifetime Rate Cap must be a number between 0.00001 and 0.99999 when loan is an ARM loan	A number of ARM loans do not have a Lifetime Rate Cap.
56	Edit Check in Question	Current Interest Rate – The annual percentage rate of the mortgage as of the last day of the reporting month	Interest Rates may exist that does not fall within this guideline (non-accrual rates, promotional rates, etc.).

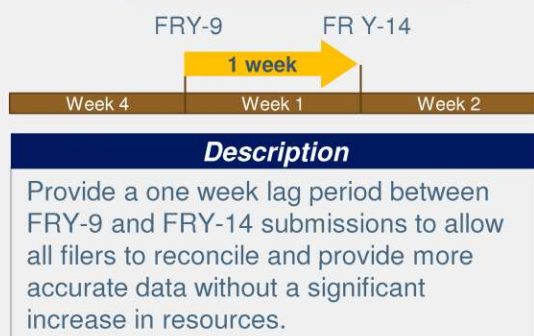


Deadlines / Timelines to Comply with Requirements

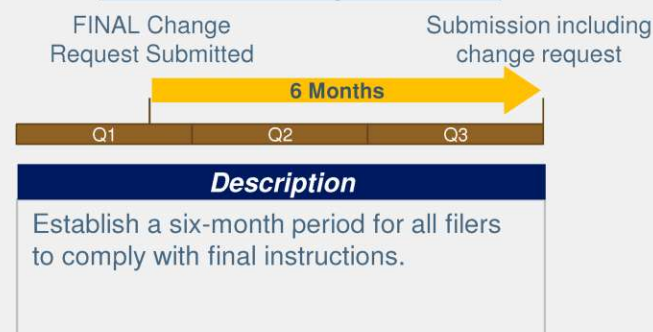
Summary:

- Under the current frameworks, reporting FSIC Members must reallocate resources to meet the established deadlines and timelines. FSIC Members are requesting to establish more reasonable deadlines and timeframes that will allow all filers sufficient time to incorporate the necessary structure, mapping, and data validation to ensure data accuracy and integrity.
- A summary of the proposed timelines and recommendations is included below:

Submission Deadlines



Timeline: Change Request



Timeline: Acquisition Data - Future



Timeline: Acquisition Data - Historic



Submission Deadlines: FR Y-9 and FR Y-14

Summary:

- FR-Y14 schedules are filed on the same day as the FRY-9C; however, FRY-14 schedules must also be reconciled against the FRY-9C.

Recommendation:

- FSIC Members are requesting to establish a one-week lag period between FRY-9 and FRY-14 submissions for all filers to allow adequate time to reconcile the reports and provide more accurate data.

Challenges / Support for Timeline:

- The FRY-9C Report Serves as an Anchor Report: The BHC's have been reporting the FRY-9C report since the late 1970s. This reporting process has evolved and matured over the past decades. Many internal control processes have been established to ensure the reporting quality of the FRY-9C. It is a good practice to reconcile the FRY-14 to FRY-9C whenever possible, but having these two reports due on the same day causes special challenges to the reporting groups. Oftentimes the FRY-14 reports have to wait for the final balance from the FRY-9C report for reconciling and research purposes. As a result, a reasonable lead time of one week between these two reporting dates is practical and desired. We believe this will improve the quality of the FRY-14 reporting overall.
- The FRY-9C and FRY-14 Reports Share the Same Data Source: Both the FRY-9C and FRY-14 reporters, in many cases, rely on the same source data providers and the same subject matter experts for their reporting requirements. A one-week lag period for the FRY-14Q will greatly alleviate the stress for the data providers, which in turn, will likely have a positive effect on the reporting quality.

Timeline: Change Request

Summary:

- Effective governance is paramount in driving data quality and is stressed under compressed timelines.
- Data requests are generally processed by organizations through established System Development Lifecycle (“SDLC”) and Quality Control (“QC”) processes. SDLC is resource dependent, requiring subject matter experts, business analysts, technology experts and end users.
- The SDLC process is generally started at the time the data request is received, however, may take from three months to one year to fully implement depending on the request, system capabilities, and resource constraints. The chart below displays an approximate percentage of time required for each phase of a standard SDLC process based on industry averages.
- The following two slides define tasks within the SDLC process and outline the benefits and challenges as it relates to FRY-14 reporting. Subsequent slides discuss the impact of changes and provide real examples of the application of SDLC as support for the timeline requested.

Recommendation:

- Currently, a change request to data requirements from the Federal Reserve occurs without sufficient time to perform the appropriate SDLC and QA processes.
- FSIC Members are requesting establishing a 6-month lag for all filers between the time when a final instruction is published to the deadline in which it much be satisfied.

Average SDLC Time by Phase

Phase / Objective	Time Required (% of project)
Receive Request	
Planning Phase	
Project definition	5%
Write Business Requirements and Obtain Sign-off	10%
Write Technical / Systems Requirements	15%
System Build / Coding and Ongoing Clarification / System Testing	55%
User Acceptance Testing	10%
Approval and Deployment / Go-Live	5%
Quality Control	Ongoing

Note: The percentages noted above are estimates based on an average change request. The SDLC process varies dramatically for less and more sophisticated changes; actual timelines may range from three months to one year or more.



Timeline: Change Request - FRY14 Q&M Timeline

Definition of Tasks within SDLC Phases:

- **Project Definition:** Interpretation of data requests in FAQ's, e-mails, coordination of project management
- **Business Requirements:** Documenting the requirements to meet the data request, as defined by the business user; enhancements; analyzing returned edit check errors; defining reconciliation needs; evaluating new edit check requirements; documenting SLA's/schedules; documenting change request and sign-off's
- **Technical / System Requirements:** Identifying the technical requirements to achieve the business requirements. This includes: database sources; documenting technical interface requirements and rules for error checks; defining data aggregation specifications; analyzing data validation rules and data integrity; documenting end-to-end data lineage and data processing requirements.
- **System Coding:** Developing ETL interface; coding the system per requirements origination system(s) capture and field validation; testing of newly developed code; program scheduling of data extraction and FRY-14 schedule production; automation of edit checks and reconciliations
- **User Acceptance Testing:** Reconciling data in schedules to G/L, Y9C, and other regulatory reports; validating portfolio accuracy; preparing schedules for submission
- **Approval and Go Live:** Implementing new data programmed requests to production; implementing various technical processes; obtaining business and executive sign-off; submission of final schedules

Average FRY-14 Q&M - SDLC Time by Phase

Phase / Objective	Time Required (% of project)
Receive Request	
Planning Phase	
Project definition	10%
Write Business Requirements and Obtain Sign-off	10%
Analyze and Write Technical / Systems Requirements	25%
System Build / Coding and Ongoing Clarification / System Testing	35%
User Acceptance Testing	15%
Approval and Deployment / Go-Live	5%
Quality Control	Ongoing

Note: The percentages noted above are estimates based on an average change request. The SDLC process varies dramatically for less and more sophisticated changes; actual timelines may range from three months to one year or more.



Timeline: Change Request - FRY14 Q&M Timeline

Benefits of SDLC:

- SDLC is an industry accepted, structured methodology to ensure that changes are implemented in an appropriate manner
- Accuracy - A thorough analysis is performed to support the accurate delivery of the new data request
- Reviews - Formal documentation, reviews, and approvals are obtained and performed
- Controls - Data extract programming includes schedules, error checking controls, and data validations
- End-to-end testing - Appropriate testing cycles will eliminate submission errors
- Reliable and proven - Provides for a repeatable and controlled data delivery
- Governance – Consistency across the organization

Existing Challenges Impacting SDLC:

- Ambiguity in new data requests often results in excess time to interpret the specific request
- The requested timeline to complete new requests does not allow for a formal SDLC
- Requirements are not communicated via a consistent channel and often without sufficient detail
- Data requirements are conflicting across schedules or within the same schedule
- Data edit check rules are delayed or published without sufficient time to incorporate and automate; automating these rules will allow for a cleaner edit check process, however, requires additional resources to build on the front end
- Resources are required to analyze the request and then perform the SDLC to implement the request

Average FRY-14 Q&M - SDLC Time by Phase

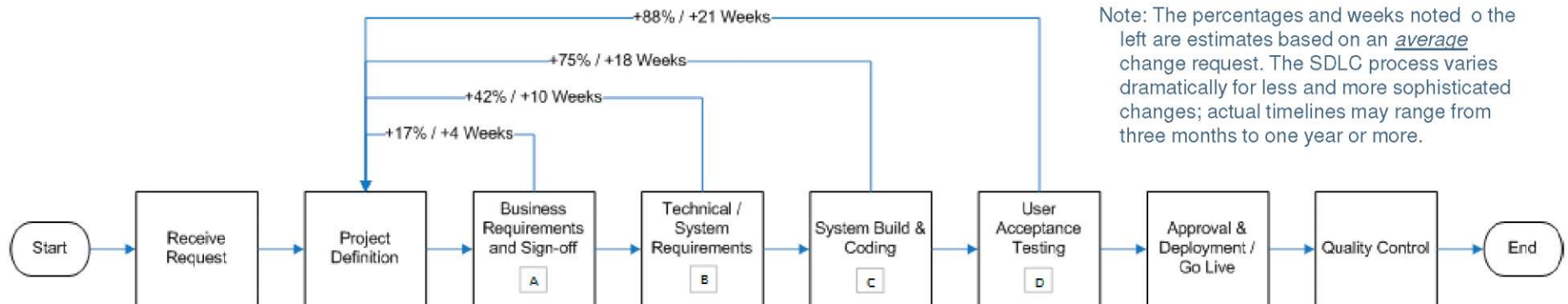
Phase / Objective	Time Required (Weeks)
Receive Request	
Planning Phase	
Project definition	2.5
Write Business Requirements and Obtain Sign-off	2.5
Write Technical / Systems Requirements	7
System Build / Coding and Ongoing Clarification / System Testing	9
User Acceptance Testing	4
Approval and Deployment / Go-Live	1
Quality Control	Ongoing

Note: The weeks noted above are estimates based on an average change request. The SDLC process varies dramatically for less and more sophisticated changes; actual timelines may range from three months to one year or more.



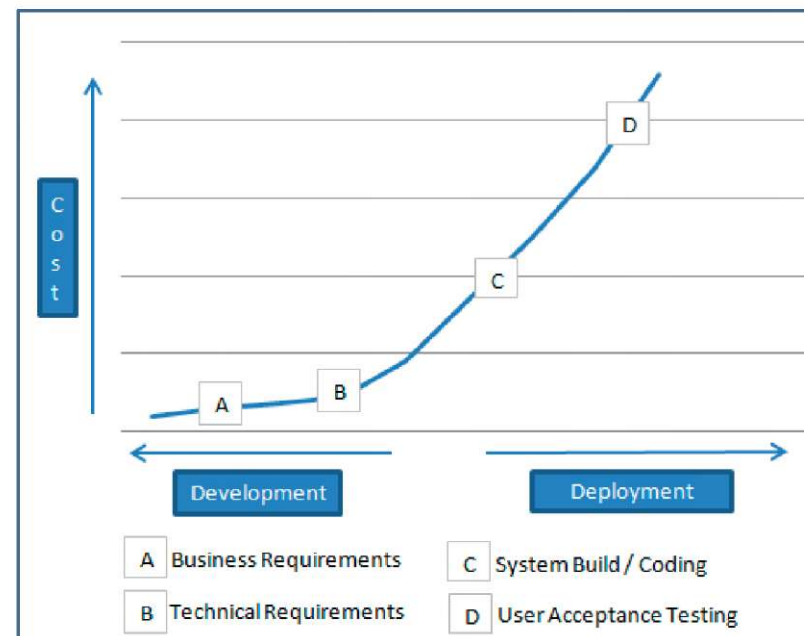
Timeline: Change Request - Impact of Changes

- Change requests to the initial data request further hinder the implementation of the complete SDLC process. The impact of change requests vary based on current progress and phase within the SDLC process. The below provides a summary of the impact of changes throughout various phases of the SDLC.



Note: The percentages and weeks noted on the left are estimates based on an average change request. The SDLC process varies dramatically for less and more sophisticated changes; actual timelines may range from three months to one year or more.

- As changes occur further along in the SDLC process, the impact (cost) of time, resources, and other constraints increases exponentially.
- Reporting FSIC Members are challenged in meeting deadlines and ensuring that data produced and submitted is accurate and complete.
- As a result, there may be an impact to data quality or downstream effect to other previously committed deliverables within the organization.



Timeline: Change Request – Gross Credit Exposure Example

Summary of Project:

- Produce a single counterparty gross credit exposure report using a specific data metric

Challenges in SDLC:

- New configuration impacted current reports in production
- Configuration updates affected Risk Reporting Asset Category Codes
- Hard-coded logic had to be replaced with automatic configuration
- Configuration flags for all outbound processes had to be consolidated
- Facility Limits previously reported by Facility Owner Customer were updated to be reported by Primary Customer
- Configuration had to be updated to include data for Credit Default Reporting

Gross Credit Exposure - SDLC Timeline

Phase / Objective	Time Required (Weeks)
Receive Request	
Planning Phase	4
Project definition	4
Write Business Requirements and Obtain Sign-off	6
Write Technical / Systems Requirements	10
System Build / Coding and Ongoing Clarification / System Testing	6
User Acceptance Testing	5
Approval and Deployment / Go-Live	5
Quality Control / Parallel Run	12
Total	52

Note: The SDLC process varies dramatically for less and more sophisticated changes; actual timelines may range from three months to one year or more.



Timeline: Acquisition Data - Future

Summary:

- Data from acquired portfolio's must be integrated into current systems or pulled separately and consolidated for data submission, however, this requires a significant amount of resources to be performed accurately within the current time requirements.

Recommendation:

- Additional time and tolerance should be given to comply with "origination" field requirements. These items could be potentially explained in supplemental schedules.
- FSIC Members have requested establishing a timeline of one year for all filers for submitting data after the close date of an acquisition.

Challenges / Support for Timeline:

- Data Integration / Consolidation: At the time of acquisition, the specifics, as to the data being acquired, are not often known and communication is limited throughout the acquisition process. Data is reviewed post-closing at which time, an organization may choose to: 1) merge acquired and existing systems to produce a consolidated data source; or 2) run systems and related reporting in parallel and consolidate data on the back-end.
- Timeline (example): System Integration 12 months post-closing date
 - 10 weeks - System and hardware comparisons and recommendations with cost estimates
 - 4 weeks - Management review and Executive approvals
 - 16 weeks - Detail data mapping, system and hardware enhancements, customer impacts
 - Concurrent to above 30 weeks – Detail credit review and rerating; identification of data gaps in acquired data
 - 10 weeks - User acceptance testing, downstream system testing
 - 10 weeks - Customer information rollout, internal user training
 - 4 weeks - Conversion weekend, post-conversion immediate issues, first month-end close
 - Conversion goes well - Consolidated data ready for Y-14 reporting

Timeline: Acquisition Data - Historic

Summary:

- Specific data fields required for reporting may not have been captured in acquired portfolios at the time of origination. Populating these data fields after acquisition may force reporting FSIC Members to expend excessive resources under already stretched resource constraints to deliver data of questionable use.

Recommendation:

- Additional time and tolerance should be given to all filer to comply with “origination” field requirements. These items could be potentially explained in supplemental schedules.
- FSIC Members have requested limiting the requirement for all filers providing historical data on acquired portfolios to data available in the acquired portfolio (maximum of five years prior to the acquisition date).

Challenges / Support for Timeline:

- Data Integration / Consolidation: At the time of acquisition, the specific data to be acquired is not often known and communication is limited throughout the acquisition process. Data is reviewed post-closing at which time, an organization may choose to: 1) merge acquired and existing systems to produce a consolidated data source; or 2) run systems and related reporting in parallel and consolidate data on the back-end.
- Significant Roadblocks Encountered in Acquiring Historic Data from Acquisitions
 - With acquisitions done as a purchase (not pooling), accounting begins at date of close. The resulting fair value and ASC 310-30 adjustments provide little value for the acquirer to convert historical data.
 - Y-14 reporting teams are left to scavenge old systems and data marts for acquired bank historical data when data of the acquired bank is merged on the acquirer's systems.
 - Many acquired institutions resulted from acquisitions they themselves made. This creates a multiplication effect in terms of historical data challenges.
 - Smaller acquired institutions often used service providers for their data needs and the contracts with these providers does not require the maintenance of history sufficient to meet Y-14 requirements





Evaluation of Objectives / Next Steps

Evaluation of Objectives

- Collaborative discussion
- Identify / agree on the issues to actively pursue
- Reach consensus on approach to resolve or address issues

Next Steps

- Coordinate a conference call by early September to discuss feedback
- Plan another meeting in October to review final recommendations
- Create individual working groups
- Establish project plans and deliverables

Schedule	Field Number	Edit Number	Edit Check Issue	Edit Test	Error Message Display	Justification / Explanation	Recommendations
Corporate	2	5	Data Gap	InternalObligorID must not be null or zero.	InternalObligorID (field 2) was not provided or a value of 0 was submitted.	Some core banking systems do not have an "ObligorID" - therefore, this is a legitimate data gap.	When specific edit-check items can be explained, do not give the error in future months
Corporate	3	8	Data Gap	OriginalInternalObligorID must not be null or zero.	OriginalInternalObligorID (field 3) was not provided or a value of 0 was submitted.	Some core banking systems do not have an "ObligorID" - therefore, this is a legitimate data gap.	When specific edit-check items can be explained, do not give the error in future months
Corporate	4	11	Data Gap	ObligorName must not be null.	ObligorName (field 4) was not provided.		
Corporate	5	13	Data Gap	City must not be null.	City (field 5) was not provided.		
Corporate	6	15	Data Gap	Country must not be null.	Country (field 6) was not provided.		
Corporate	8	19	Data Gap	IndustryCode must not be null.	IndustryCode (field 8) was not provided.		
Corporate	9	21	Data Gap	IndustryCodeType must not be null.	IndustryCodeType (field 9) was not provided.		
Corporate	10	24	Data Gap	InternalRating must not be null.	InternalRating (field 10) was not provided.		
Corporate	11	26	Data Gap	TIN must not be null.	TIN (field 11) was not provided.		
Corporate	24	55	Edit Check In Question	CommittedExposure must not be null or negative.	CommittedExposure (field 24) was not provided or amount is negative.	Some transactions can have negative commitments (Syndications and/or Participations)	Adjust the edit check to allow negative commitments when the record is a "sold" transaction
Corporate	28	66	Data Gap	CumulativeChargeoffs must not be null.	CumulativeChargeoffs (field 28) was not provided.		
Corporate	30	72	Data Gap	ASC31010 must not be null or negative.	ASC31010 (field 30) was not provided or amount is negative.		
Corporate	31	75	Data Gap	ASC31030 must not be null or negative.	ASC31030 (field 31) was not provided or amount is negative.		
Corporate	19	127	Edit Check In Question	The date reported for MaturityDate should be later than or equal to the quarter end date.	MaturityDate (field 19) should be later than or equal to the quarter end date (e.g. 2011-03-31).	Loans in workout or in the process of renewal/extension at quarter end fail this check. These are standard business processes and should not be considered errors.	Invalid logic, common business practices often create situations where a loan matures prior to the current reporting period-end.
Corporate	68	174	Edit Check In Question	TangibleAssets should be greater than or equal to the sum of CurrentAssetsCurrent and FixedAssets.	The sum of CurrentAssetsCurrent (field 66) and FixedAssets (field 69) should not exceed TangibleAssets (field 68).	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.	Logic should accept a tolerance for rounding differences.
Corporate	66	180	Edit Check In Question	CurrentAssetsCurrent should be greater than or equal to the sum of CashMarketableSecurities, AccountsReceivableCurrent and InventoryCurrent.	The sum of CashMarketableSecurities (field 61), AccountsReceivableCurrent (field 62) and InventoryCurrent (field 64) should not exceed CurrentAssetsCurrent (field 66).	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.	Logic should accept a tolerance for rounding differences.
Corporate	67	183	Edit Check In Question	CurrentAssetsPriorYear should be greater than or equal to the sum of AccountsReceivablePriorYear and InventoryPriorYear.	The sum of AccountsReceivablePriorYear (field 63) and InventoryPriorYear (field 65) should not exceed CurrentAssetsPriorYear (field 67).	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.	Logic should accept a tolerance for rounding differences.
Corporate	33	189	Edit Check In Question	If NonAccrualDate is not equal to 9999-12-31, then NonAccrualDate should be prior to the MaturityDate.	The date reported for the NonAccrualDate (field 33) should be prior to the date reported for the MaturityDate (field 19).	It is standard business practice for a loan to be placed on non accrual status after the maturity date. Non accrual date can be after maturity date if the borrower continues to pay interest after maturity or loan is in workout. These should not be errors.	Invalid logic, common business practices often create situations where a loan is placed on non-accrual after maturity. It is not often practical for us to make an accrual decision prior to maturity.
Corporate	12	206	Data Gap	StockExchange must not be null.	StockExchange (field 12) was not provided.		
Corporate	13	207	Data Gap	TKR must not be null.	TKR (field 13) was not provided.		
Corporate	14	208	Data Gap	CUSIP must not be null.	CUSIP (field 14) was not provided.		
Corporate	25	211	Edit Check In Question		The sum of UtilizedExposure (field 25) should be less than or equal to FR Y-9C (HC-CM10a5B), for all loans where LineReportedOnFRY9C (field 26) is equal to 10 and FairValueAdjustment (field 29) is not equal to NA.	We find the CCAR Corporate Loan Schedule requirements to be in conflict with FRY9C requirement, and this edit invalid.	Recommend turning off this automated edit-check, in favor of providing a manual-reconciliation between the two fields
Corporate	44	218	Data Gap	GuarantorFlag must equal 1, 2, 3 or 4.	GuarantorFlag (field 44) must equal 1, 2, 3 or 4.		
Corporate	45	223	Data Gap	GuarantorInternalID must not be null.	GuarantorInternalID (field 45) was not provided.		
Corporate	46	225	Data Gap	GuarantorName must not be null.	GuarantorName (field 46) was not provided.		
Corporate	47	227	Data Gap	GuarantorTIN must not be null.	GuarantorTIN (field 47) was not provided.		

Corporate	48	229	Data Gap	GuarantorInternalRiskRating must not be null.	GuarantorInternalRiskRating (field 48) was not provided.		
Corporate	8	303	Edit Check In Question		For the the current and previous quarter the IndustryCode (field 8) does not match for the same InternalCreditFacilityID (field 15), InternalObligorID (field 2) and IndustryCodeType (field 9).	This value changes as part of the normal course of business. Trend is as expected.	Establish a tolerance that recognizes some codes change - as a result of coding corrections and/or borrower changes.
Corporate	11	305	Edit Check In Question	If InternalCreditFacilityID (current quarter) is equal to InternalCreditFacilityID (previous quarter) and InternalObligorID (current quarter) is equal to InternalObligorID (previous quarter) then the TIN (current quarter) should be equal to TIN (previous quarter).	For the the current and previous quarter the TIN (field 11) does not match for the same InternalCreditFacilityID (field 15) and InternalObligorID (field 2).		Establish a tolerance that recognizes some codes change - as a result of coding corrections and/or borrower changes.
Corporate	18	309	Edit Check In Question	If InternalCreditFacilityID (current quarter) is not equal to an InternalCreditFacilityID (previous quarter) and OriginalInternalCreditFacilityID (current quarter) is not equal to an InternalCreditFacilityID (previous quarter) then the OriginationDate (current quarter) must be after the previous quarter reporting date.	New loan submissions for this reporting period should have an OriginationDate between previous and current report period	These loans originated previously but did not meet the submission requirements previously. Primarily commitment increases.	Establish a tolerance that recognizes some loans may move between schedules or become applicable to CCAR reporting thresholds after origination.
Corporate	16	310	Edit Check In Question	If InternalCreditFacilityID (current quarter) is equal to InternalCreditFacilityID (previous quarter) then the OriginalInternalCreditFacilityID (current quarter) should be equal to OriginalInternalCreditFacilityID (previous quarter).	For the the current and previous quarter the OriginalInternalCreditFacilityID (field 16) does not match for the same InternalCreditFacilityID (field 15).	Per instruction for item 16 OriginalInternalCreditFacilityID (The Internal identification code assigned to the credit facility record in the previous submission), if a facility's ID changes (e.g. due to systems conversion), the reporting should look as follows. Assume that Loan ABC converts during Q2 and has a new identifier of DEF: Q1 Original Credit Internal Facility ID (field 16) = ABC Q1 Credit Internal Facility ID (field 15) = ABC Q2 Original Credit Internal Facility ID (field 16) = ABC <<Conversion occurs on 4/15/2013>> Q2 Credit Internal Facility ID (field 15) = DEF Q3 Original Credit Internal Facility ID (field 16) = DEF Q3 Credit Internal Facility ID (field 15) = DEF. This edit rule will fail this record in the Q3 2013 QA file, but this is a legitimate situation.	The way bank's deal with changes to CreditFacilityIDs and the subsequent OriginalInternal CreditFacilityIDs is such that the logic for this edit check will create false-positive errors. We recommend that this edit-check be turned-off.
Corporate	18	311	Edit Check In Question	If InternalCreditFacilityID (current quarter) is equal to InternalCreditFacilityID (previous quarter) then the OriginationDate (current quarter) should be equal to OriginationDate (previous quarter).	For the the current and previous quarter the OriginationDate (field 18) does not match for the same InternalCreditFacilityID (field 15).	Loans are routinely extended and renewed, while keeping the same loan number, and this check does not take this into account, making any extension or renewal an error, which they are not.	One solution would be to only flag situations where the Origination Date moved backward since the prior quarter, but allow situations when the Origination Date moves forward (but remains prior to the as of date). If the loan has renewed or extended (as identified by other fields in the schedule), then this edit check should not be applicable.

Corporate	19	312	Edit Check In Question	If InternalCreditFacilityID (current quarter) is equal to InternalCreditFacilityID (previous quarter) then the MaturityDate (current quarter) should be equal to MaturityDate (previous quarter).	For the the current and previous quarter the MaturityDate (field 19) does not match for the same InternalCreditFacilityID (field 15).	Loans are routinely extended and renewed, while keeping the same loan number, and this check does not take this into account, making any extension or renewal an error, which they are not. One solution would be to allow a certain degree of change for the Maturity Date. We believe there is enough information to filter out those credit facilities where maturity date was extended and origination date changed indicating a renewal. (goes with Edit #311 above)	Edit check should allow changes in the maturity date to allow short-term extension 90-120 days without creating an alert.
Corporate	20	313	Edit Check In Question		For the the current and previous quarter the FacilityType (field 20) does not match for the same InternalCreditFacilityID (field 15).	This value changes as part of the normal course of business. Trend is as expected.	Establish a tolerance that recognizes some codes change - as a result of coding corrections and/or borrower changes.
Corporate	27	318	Edit Check In Question		For the the current and previous quarter the LineOfBusiness (field 27) does not match for the same InternalCreditFacilityID (field 15).	This value changes as part of the normal course of business. Trend is as expected.	Establish a tolerance that recognizes some codes change - as a result of coding corrections and/or borrower changes.
Corporate	37	326	Edit Check In Question	If InternalCreditFacilityID (current quarter) is equal to InternalCreditFacilityID (previous quarter) and InterestRateVariability (previous quarter) equals 1, 2, or 3, then InterestRateVariability (previous quarter) should equal InterestRateVariability (current quarter).	For the same InternalCreditFacilityID (field 15), if InterestRateVariability (field 37) previous quarter equals 1, 2, or 3, then InterestRateVariability (field 37) previous quarter should equal InterestRateVariability (field 37) for the current quarter.	When loans go from funded to unfunded, or vice versa, they should not trip quarter over quarter interest rate checks.	Edit check should consider if the funded amount is zero in current quarter - and no longer expect InterestRateVariability to match prior quarter.
Corporate	39	328	Edit Check In Question	If InternalCreditFacilityID (current quarter) is equal to InternalCreditFacilityID (previous quarter) and InterestRateIndex (previous quarter) equals 1, 2, 3, 4, 5 or 6, then InterestRateIndex (previous quarter) should equal InterestRateIndex (current quarter).	For the same InternalCreditFacilityID (field 15), if InterestRateIndex (field 39) previous quarter equals 1, 2, 3, 4, 5 or 6, then InterestRateIndex (field 39) previous quarter should equal InterestRateIndex (field 39) for the current quarter.	When loans go from funded to unfunded, or vice versa, they should not trip quarter over quarter interest rate checks. This value changes as part of the normal course of business. Trend is as expected.	Edit check should consider if the funded amount is zero in current quarter - and no longer expect InterestRateIndex to match prior quarter.
Corporate	70	330	Edit Check In Question	TotalAssetsCurrent should be greater than or equal to TangibleAssets.	TangibleAssets (field 68) should not exceed TotalAssetsCurrent (field 70).	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.	Logic should accept a tolerance for rounding differences.
Corporate	71	331	Edit Check In Question	TotalAssetsPriorYear should be greater than or equal to CurrentAssetsPriorYear.	CurrentAssetsPriorYear (field 67) should not exceed TotalAssetsPriorYear (field 71).	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.	Logic should accept a tolerance for rounding differences.
Corporate	76	332	Edit Check In Question	CurrentLiabilitiesCurrent should be greater than or equal to the sum of AccountsPayableCurrent, ShortTermDebt and CurrentMaturitiesLongTermDebt.	The sum of AccountsPayableCurrent (field 72), ShortTermDebt (field 74) and CurrentMaturitiesLongTermDebt (field 75) should not exceed CurrentLiabilitiesCurrent (field 76).	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.	Logic should accept a tolerance for rounding differences.
CRE	3	9	Edit Check In Question		OutstandingBalance must be a positive numeric whole number	Some transactions can have negative balance (Syndications and/or Participations)	Adjust the edit check to allow negative balance when the record is a "sold" transaction
CRE	5	15	Edit Check In Question		CommittedBalance must be positive numeric and a whole number	Some transactions can have negative commitments (Syndications and/or Participations)	Adjust the edit check to allow negative commitments when the record is a "sold" transaction

CRE	12	34	Data Gap	NetOperatingIncome must be numeric or NA if LineReportedOnFRY9C IN (1,2,7), and must be numeric if LineReportedOnFRY9C IN (3,5), and must be NA if LineReportedOnFRY9C IN (4).The value of 4 is valid from 2011-09-30 to 2012-03-31. The value of 6 is valid from 2009-12-31 to 2011-06-30.	NetOperatingIncome must be numeric or NA if LineReportedOnFRY9C IN (1,2,7), and must be numeric if LineReportedOnFRY9C IN (3,5), and must be NA if LineReportedOnFRY9C IN (4).The value of 4 is valid from 2011-09-30 to 2012-03-31. The value of 6 is valid from 2009-12-31 to 2011-06-30.		
CRE	15	43	Data Gap		InternalRating must be provided		
CRE	19	55	Data Gap		MaturityDate should not be prior to 2000		
CRE		66	Data Gap	CurrentOccupancy must be provided and ≥ 0 and ≤ 1 or NA	CurrentOccupancy must be provided and ≥ 0 and ≤ 1 or NA		
CRE	30	87	Data Gap		If InterestRateVariability < 1 (not fixed), then InterestRateCeiling must be > 0 and ≤ 1 , or 0 if OutstandingBalance (field #3) = 0 and CommittedBalance (field #5) > 0 , or NONE. If InterestRateVariability = 1 (fixed), then InterestRateCeiling must be NA.		
CRE	31	90	Data Gap		If InterestRateVariability < 1 (not fixed), then InterestRateFloor must be > 0 and ≤ 1 , or 0 if OutstandingBalance (field #3) = 0 and CommittedBalance (field #5) > 0 , or NONE. If InterestRateVariability = 1 (fixed), then InterestRateFloor must be NA.		
CRE	33	95	Data Gap		InterestReserves must be provided		
CRE	29	104	Data Gap		InterestRatesSpread must be ≥ -1 and ≤ 1 if InterestRateVariability < 1 , or InterestRateSpread must equal NA if InterestRateVariability = 1 (fixed)		
CRE	3	112	Edit Check In Question		OutstandingBalance must not be multiple of 10 from prior quarter. For example, the prior quarter was 10 and the current quarter was 100. $100 / 10 = 10$.		Edit check should allow large balance changes when the prior quarter balance was small. Establish a tolerance for balance changes quarter over quarter.
CRE	5	115	Edit Check In Question		CommittedBalance must not be multiple of 10 from prior quarter. For example, the prior quarter was 10 and the current quarter was 100. $100 / 10 = 10$.		Edit check should allow large commitment changes when the prior quarter commitment was small. Establish a tolerance for balance changes quarter over quarter.
CRE	12	123	Edit Check In Question		NetOperatingIncome should not be negative	Negative NOI can be legitimate. For instance, Negative NOI is accurate based on 2011 data - borrower has property listed for sale. From instructions: "...but negative numbers can be submitted"	Establish tolerance for accepting legitimate instances where the Borrower actually has negative income.
CRE	12	127	Data Gap		30 yr amort DSC is greater than 200: $(\text{NetOperatingIncome} / 12) / (\text{pmt}(\text{PV}=\text{CommittedBalance}+\text{CumulativeChargeoffs}, \text{FV}=0, \text{N}=360, \text{Int}=\text{InterestRate} / 12))$		
CRE	29	129	Data Gap		If InterestRateSpread is not 'NA', Then InterestRateSpread should be less than or equal to InterestRate		
CRE	6	131	Edit Check In Question		CumulativeChargeoffs must not be multiple of 10 from prior quarter. For example, the prior quarter was 10 and the current quarter was 100. $100 / 10 = 10$.		Edit check should allow large changes to cumulative charge-offs when the prior quarter balance was small. Establish a tolerance for cumulative charge-off changes quarter over quarter.

CRE	35	140	Edit Check In Question		If Acq Loan= 2 and OriginationDate is < the first date of the reporting quarter, then OrigLoanNumber Must Exist In Previous Quarter Loan Number field.	1Q2013 original loan number = Q42012 loan number. We do not understand this error. We believe we are handling correctly in light of the ability to match credit facility records as indicated in our explanation.	
CRE	12	141	Edit Check In Question	If Current quarter (CrossCollateralizedLoan, LineReportedOnY9C, and OriginationDate) is equal to Prior quarter (CrossCollateralizedLoan, LineReportedOnY9C, and OriginationDate) then current quarter NetOperatingIncome must equal to prior quarter NetOperatingIncome.	If Current quarter (CrossCollateralizedLoan, LineReportedOnY9C, and OriginationDate) is equal to Prior quarter (CrossCollateralizedLoan, LineReportedOnY9C, and OriginationDate) then current quarter NetOperatingIncome must equal to prior quarter NetOperatingIncome.	We often receives updated NOI values on an annual basis, so they are routinely updated even though the Origination Date doesn't change. It would be appropriate to add a comparison of the Last NOI Date into this check also.	
CRE		143	Edit Check In Question	If the current OriginationDate is the same as prior quarter, then current MaturityDate must equal to prior quarter.	If the current OriginationDate is the same as prior quarter, then current MaturityDate must equal to prior quarter.		Edit check should allow changes in the maturity date to allow short-term extension 90-120 days without creating an alert. The origination date will not change on extensions.
CRE		144	Edit Check In Question	If the current OriginationDate is the same as prior quarter, then current Amortization must equal to prior quarter.	If the current OriginationDate is the same as prior quarter, then current Amortization must equal to prior quarter.		Edit check should accept that Modifications occur which change the amortization. Establish a tolerance for this type of change.
CRE		151	Data Gap	If the current OriginationDate is the same as prior quarter, then current ValueAtOrigination must equal to prior quarter.	If the current OriginationDate is the same as prior quarter, then current ValueAtOrigination must equal to prior quarter.		
CRE	39	156	Data Gap	PropertySize must be (numeric and a whole number) or NA	PropertySize must be (numeric and a whole number) or NA		
CRE	39	157	Edit Check In Question	If the current OriginationDate is the same as prior quarter, then current PropertySize must equal to prior quarter.	If the current OriginationDate is the same as prior quarter, then current PropertySize must equal to prior quarter.		Edit check should allow tolerance for instances when re-appraisal reflects that the property size has changed.
CRE		158	Data Gap	CurrentNetOperatingIncome must be numeric or NA if LineReportedOnFRY9C IN (1,2,7), and must be numeric if LineReportedOnFRY9C IN (3,5). The value of 4 is valid for 2011-12-31 to 2012-03-31.	CurrentNetOperatingIncome must be numeric or NA if LineReportedOnFRY9C IN (1,2,7), and must be numeric if LineReportedOnFRY9C IN (3,5). The value of 4 is valid for 2011-12-31 to 2012-03-31.		
CRE	40	160	Edit Check In Question		CurrentNetOperatingInc should not be negative	Negative Current NOIs can be legitimate. From instructions: "...but negative numbers can be submitted"	Establish tolerance for accepting legitimate instances where the Borrower actually has negative income.
CRE	40	162	Data Gap		30 yr amort DSC is greater than 200: (CurrentNetOperatingInc / 12) / (pmt(PV=CommittedBalance+CumulativeChargeof fs,FV=0,N=360, Int=InterestRate / 12))		
CRE		163	Data Gap	If prior quarter CurrentNetOperatingInc was a numeric value and prior quarter LineReportedOnY9C equals current quarter LineReportedOnY9C, then current quarter must not be NA or null.	If prior quarter CurrentNetOperatingInc was a numeric value and prior quarter LineReportedOnY9C equals current quarter LineReportedOnY9C, then current quarter must not be NA or null.		
CRE	41	166	Edit Check In Question		If CurrentNetOperatingInc is not "NA", then LastNOIDate should be less than maturity date	Loans that have passed their maturity date are often in workout, in which case the bank routinely receives updated financial statements.	Invalid check, NOI Date cannot be checked for validity against Maturity Date

CRE	43	174	Edit Check In Question		LastValuationDate should be less than maturity date	Loans that have passed their maturity date are often in workout, in which case the bank routinely receives updated appraisals. Most of the records have no value. The rest have an evaluation date after maturity.	Invalid check, LastValuationDate cannot be checked for validity against Maturity Date
CRE	46	184	Data Gap		ASC31010 should not be negative		
CRE	47	185	Data Gap		ASC31030 should not be negative		
CRE	48	186	Data Gap		Count of FairValueAdjustment=0 and NULL should be less than 100% of total loan count.		
CRE	46	187	Data Gap		Count of ASC31010= 0 and NULL should be less than 100% of total loan count.		
CRE	27	188	Data Gap		Interest rate should not be greater than 20%		
CRE	3	192	Edit Check In Question	For all loans reported by institution where LineReportedOnFRY9C is equal to 2, then the sum of OutstandingBalance should be less than or equal to HC-C1a2(BHCKF159) on FRY9C times 1000.	For all loans reported by institution where LineReportedOnFRY9C is equal to 2, then the sum of OutstandingBalance should be less than or equal to HC-C1a2(BHCKF159) on FRY9C times 1000.		Recommend turning off this automated edit-check, in favor of providing a manual-reconciliation between the two fields
CRE	25	231	Edit Check In Question		If LineReportedOnFRY9C equals (3 or 5), then LoanPurpose should not equal (1,2,3,or 5)	According to the requirements, the LoanPurpose is to be the loan purpose at origination/renewal. However, loans can change Y9C lines outside of origination/renewal (e.g. moving from construction to non-construction).	Establish tolerance for accepting legitimate instances where the Purpose Code changes
CRE	47	232	Edit Check In Question		Count of ASC31030 = 0 and NULL should be less than 100% of total loan count.	We do not have any loans that meet the ASC 310-30 condition. We submitted zeros on all loans and blanks on the cross collateralized records	When specific edit-check items can be explained, do not give the error in future months
USSB	41		Edit Check In Question	D_BANKRUPTCY_CO must not be negative.	D_BANKRUPTCY_CO must not have a negative value.	When recoveries exceed the original charged-off amount, this field can become negative. This negative charge-off amount eventually gets refunded to the customer, but while it is on the books - appears as a negative charge-off balance.	Establish a threshold that recognizes the occurrence negative charge-off balances for a time.
USSB	5	35	Edit Check In Question	D_COMMITMENTS must not be negative.	D_COMMITMENTS must not have a negative value.	Since the commitment is linked to the balance, if the D_OS is negative than the D_COMMITMENTS will also be negative. An account may overpay or have a credit applied to the account and show as a negative outstanding balance amount.	Establish a threshold that recognizes the occurrence negative commitments.
USSB	7	39	Edit Check In Question	D_GROSS_CONTRACTUAL_CO must not be negative.	D_GROSS_CONTRACTUAL_CO must not have a negative value.	Negative charge-off and recovery values can result from several actions. An account that has gone to charge-off can be brought out of charge-off with a manual reversal entry, causing a negative charge-off. Manual reversal entries can occur if a customer pays on the loan after it has gone to charge-off.	Establish a threshold that recognizes the occurrence negative charge-off balances for a time.
USSB	37		Data Gap	D_MODIFICATIONS must not be negative.	D_MODIFICATIONS must not have a negative value.		
USSB	4	34	Edit Check In Question	D_OS must be greater than or equal to D_NEW_ACCOUNTS.	D_NEW_ACCOUNTS must not be greater than D_OS.	An account may charge new volume and return or pay it down in the same month - which would make the D_New_Accounts greater than D_OS.	Establish threshold the recognizes the justification (see comment).
USSB	2	24	Edit Check In Question	D_OS must not be negative.	D_OS must not have a negative value.	An account may overpay, have a credit applied to the account, or be guaranteed and show as a negative outstanding account balance.	Establish threshold the recognizes the justification (see comment).
USSB	2	26	Edit Check In Question	If N_ACCT is greater than zero, then D_OS must be equal or greater than zero.	N_ACCT is greater than zero so D_OS must be equal or greater than zero.	An account may overpay or have a credit applied to the account and show as a negative outstanding account balance.	Establish threshold the recognizes the justification (see comment).
USSB	43		Edit Check In Question	D_RECOVERIES must not be negative.	D_RECOVERIES must not have a negative value.	Reversal of recovery in subsequent month can cause this field to be negative.	Establish threshold the recognizes the justification (see comment).

USOthCons	42		Edit Check In Question	D_BKCO must not be negative.	D_BKCO must not have a negative value.	When recoveries exceed the original charged-off amount, this field can become negative. This negative charge-off amount eventually gets refunded to the customer, but while it is on the books - appears as a negative charge-off balance.	Establish threshold the recognizes the justification (see comment).
USOthCons	41		Edit Check In Question	D_GCO must not be negative.	D_GCO must not have a negative value.	When recoveries exceed the original charged-off amount, this field can become negative. This negative charge-off amount eventually gets refunded to the customer, but while it is on the books - appears as a negative charge-off balance.	Establish threshold the recognizes the justification (see comment).
USOthCons			Data Gap	If N_NEW_ACCOUNTS is greater than zero, then D_NEW_COMMITMENTS must be greater than zero.	N_NEW_ACCOUNTS is greater than zero so D_NEW_COMMITMENTS must be greater than zero.		
USOthCons	2	33	Edit Check In Question	If N_ACCT is greater than zero, then D_OS must be greater than zero.	N_ACCT is greater than zero so D_OS must be greater than zero.	Revolving accounts within the U.S. Other Consumer population are commonly active but may have a \$0 balance	Recommend discontinuation of this edit because the existence of a commitment does not require the existence of an outstanding amount.
USOthCons		31	Edit Check In Question	D_OS must not be negative.	D_OS must not have a negative value.	Segments with small number of loans can have a negative balance due to customer over-payments.	Establish threshold the recognizes the justification (see comment).
USOthCons		33	Edit Check In Question	If N_ACCT is greater than zero, then D_OS must be greater than zero.	N_ACCT is greater than zero so D_OS must be greater than zero.	Revolving Acct can be open/active but have a current zero outstanding balance.	Recommend discontinuation of this edit because the existence of an account does not require the existence of an outstanding amount.
USOthCons	5	43	Edit Check In Question	D_RECOVERIES must not be negative.	D_RECOVERIES must not have a negative value.	Negative charge-off and recovery values can result from several actions. An account that has gone to charge-off can be brought out of charge-off with a manual reversal entry, causing a negative charge-off. Manual reversal entries can occur if a customer pays on the loan after it has gone to charge-off.	Establish threshold the recognizes the justification (see comment).
Auto		42	Edit Check In Question	D_OS must not be negative.	D_OS must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		44	Edit Check In Question	If N_ACCT is greater than zero, then D_OS must be greater than zero.	N_ACCT is greater than zero so D_OS must be greater than zero.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		45	Edit Check In Question	D_OS must be greater than or equal to the sum of D_VEHICLE_TYPE_CAR_VAN, D_VEHICLE_TYPE_SUV_TRUCK, D_VEHICLE_TYPE_SPORT and D_VEHICLE_TYPE_UNKNOWN.		Edit fails if the sum of the components of off on the 6th place to right of the decimal. This outage is due to rounding.	Logic should accept a tolerance for rounding differences.
Auto		46	Edit Check In Question	D_OS must be greater than or equal to the sum of D_ORIG_TERM_LE_48, D_ORIG_TERM_49_60, D_ORIG_TERM_61_72 and D_ORIG_TERM_G_72.		Edit fails if the sum of the components of off on the 6th place to right of the decimal. This outage is due to rounding.	Logic should accept a tolerance for rounding differences.
Auto		54	Edit Check In Question	D_OS must be greater than or equal to D_NEW_ACCOUNTS.		When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		58	Edit Check In Question	D_VEHICLE_TYPE_CAR_VAN must not be negative.	D_VEHICLE_TYPE_CAR_VAN must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).

Auto		60	Edit Check In Question	D_VEHICLE_TYPE_SUV_TRUCK must not be negative.	D_VEHICLE_TYPE_SUV_TRUCK must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		62	Edit Check In Question	D_VEHICLE_TYPE_SPORT must not be negative.	D_VEHICLE_TYPE_SPORT must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		64	Edit Check In Question	D_VEHICLE_TYPE_UNKNOWN must not be negative.	D_VEHICLE_TYPE_UNKNOWN must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto	10	66	Edit Check In Question	D_REPO must not be negative.	D_REPO must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto	10	67	Edit Check In Question	If N_ACCT is equal to null or zero, then D_REPO must equal null or zero.		Since repos are not considered active loans, the N_accts can be zero and D Repo positive	Establish threshold the recognizes the justification (see comment).
Auto	10	68	Edit Check In Question	D_OS must be greater than or equal to D_REPO.		Since repos are not considered active loans, the D_OS can be zero and D Repo positive	Establish threshold the recognizes the justification (see comment).
Auto	10	69	Edit Check In Question	If D_CUR_MONTH_REPO is greater than zero then D_REPO must be greater than zero.	The reported value for D_CUR_MONTH_REPO is greater than zero so D_REPO must be greater than zero.	The D_REPO field represents the legal balance of a repossession account as of month-end. The D_CUR_MONTH_REPO field is the balance at the time of repossession, which is often higher than the legal balance. For instance, a car was in Repo on day 3 of the month, later the auto was auctioned and out of Repo inventory. In this example, D_REPO doesn't include this auto balance at the month-end; however, the D_CUR_MONTH_REPO include this auto balance in it.	Establish threshold the recognizes the justification (see comment).
Auto	10	70	Edit Check In Question	D_REPO must be greater than or equal to D_CUR_MONTH_REPO.	The reported value for D_CUR_MONTH_REPO must not be greater than D_REPO.	The D_REPO field represents the legal balance of a repossession account as of month-end. The D_CUR_MONTH_REPO field is the balance at the time of repossession, which is often higher than the legal balance. For instance, a car was in Repo on day 3 of the month, later the auto was auctioned and out of Repo inventory. In this example, D_REPO doesn't include this auto balance at the month-end; however, the D_CUR_MONTH_REPO include this auto balance in it.	Establish threshold the recognizes the justification (see comment).
Auto		71	Edit Check In Question	D_CUR_MONTH_REPO must not be negative.	D_CUR_MONTH_REPO must not have a negative value.	When a segment with a small number/balance of loans has a repossession which exceeds the amount outstanding, until the amounts are refunded to the Borrower, the balance in the segment will be negative for this field.	Establish threshold the recognizes the justification (see comment).
Auto	11	72	Edit Check In Question	If N_ACCT is equal to null or zero, then D_CUR_MONTH_REPO must equal null or zero.	A null or a zero value was provided for N_ACCT so D_CUR_MONTH_REPO must also have a value of null or zero.	A vehicle may be repossessed and sold in the same month. The d_cur_month_repo gets populated since the vehicle is repossessed but the n_acct reverts to 0 since the record is no longer an active loan.	Allow a small variance for D Repo to be positive if there are no D CUR MONTH REPO in the segment.

Auto	12	73	Edit Check In Question	D_GROSS_CONTRACTUAL_CO must not be negative.	D_GROSS_CONTRACTUAL_CO must not have a negative value.	Negative charge-off and recovery values can result from several actions. An account that has gone to charge-off can be brought out of charge-off with a manual reversal entry, causing a negative charge-off. Manual reversal entries can occur if a customer pays on the loan after it has gone to charge-off. In addition, expenses that occur during the repossession process can cause negative charge-offs or recoveries. The repossession expenses include towing fees, impound fees, auction fees, insurance claim fees, etc.	Establish threshold the recognizes the justification (see comment).
Auto	13	75	Edit Check In Question	D_BANKRUPTCY_CO must not be negative.	D_BANKRUPTCY_CO must not have a negative value.	Negative charge-off and recovery values can result from several actions. An account that has gone to charge-off can be brought out of charge-off with a manual reversal entry, causing a negative charge-off. Manual reversal entries can occur if a customer pays on the loan after it has gone to charge-off. In addition, expenses that occur during the repossession process can cause negative charge-offs or recoveries. The repossession expenses include towing fees, impound fees, auction fees, insurance claim fees, etc.	Establish threshold the recognizes the justification (see comment).
Auto	14	77	Edit Check In Question	D_RECOVERIES must not be negative.	D_RECOVERIES must not have a negative value.	Negative charge-off and recovery values can result from several actions. An account that has gone to charge-off can be brought out of charge-off with a manual reversal entry, causing a negative charge-off. Manual reversal entries can occur if a customer pays on the loan after it has gone to charge-off. In addition, expenses that occur during the repossession process can cause negative charge-offs or recoveries. The repossession expenses include towing fees, impound fees, auction fees, insurance claim fees, etc.	Establish threshold the recognizes the justification (see comment).
Auto		83	Edit Check In Question	D_ACCT_EVER_30DPD_LAST12 must not be negative.	D_ACCT_EVER_30DPD_LAST12 must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		85	Edit Check In Question	D_OS must be greater than or equal to D ACCT EVER 30DPD LAST12.		When a segment is reducing over time - and eventually becomes zero - the amount 30DPD in the last 12 months will acceptably be greater than the current outstanding in the segment.	Establish threshold the recognizes the justification (see comment).
Auto		86	Edit Check In Question	D_ACCT_EVER_60DPD_LAST12 must not be negative.	D_ACCT_EVER_60DPD_LAST12 must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		88	Edit Check In Question	D_OS must be greater than or equal to D ACCT EVER 60DPD LAST12.		When a segment is reducing over time - and eventually becomes zero - the amount 60DPD in the last 12 months will acceptably be greater than the current outstanding in the segment.	Establish threshold the recognizes the justification (see comment).
Auto		95	Edit Check In Question	D_ORIG_TERM_LE_48 must not be negative.		When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		97	Edit Check In Question	D_ORIG_TERM_49_60 must not be negative.	D_ORIG_TERM_49_60 must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).

Auto		99	Edit Check In Question	D_ORIG_TERM_61_72 must not be negative.	D_ORIG_TERM_61_72 must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		101	Edit Check In Question	D_ORIG_TERM_G_72 must not be negative.	D_ORIG_TERM_G_72 must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		103	Edit Check In Question	D_ORIG_CHANNEL_DIRECT must not be negative.	D_ORIG_CHANNEL_DIRECT must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		105	Edit Check In Question	D_OS must be greater than or equal to D_ORIG_CHANNEL_DIRECT.		When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		106	Edit Check In Question	D_LOSS_MITIGATION must not be negative.	D_LOSS_MITIGATION must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		108	Edit Check In Question	D_OS must be greater than or equal to D_LOSS_MITIGATION.		When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		109	Edit Check In Question	D_JOINT_APPLICATION must not be negative.	D_JOINT_APPLICATION must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		111	Edit Check In Question	D_OS must be greater than or equal to D_JOINT_APPLICATION.		Some loans in the segment could have negative balances, making the D_JOINT_APPLICATION greater than the total D_OS in segment.	Allow for small variances to allow for negative balances
Home Equity	41	41	Edit Check In Question	Current Interest Rate – The annual percentage rate of the loan as of the last day of the reporting month.	Current Interest Rate must be a number between 0.00001 and 0.24999	Interest Rates may exist that does not fall within this guideline (non-accrual rates, promotional rates, etc.)	Establish threshold that recognizes the justification (see comment).
Home Equity	11	11	Data Gap	Debt to Income (DTI) - The total monthly liabilities of the borrower, including the debt on the subject property, divided by the total monthly income of the borrower(s). Note, both Field #11 (Debt to Income DTI –Back-End) and Field #12 (Debt to Income DTI - Front-End) should be provided as measured at origination. This field may be provided on a best efforts basis for loans serviced for others and loans acquired through mergers and acquisitions.	Original Backend DTI must be a valid positive whole number		

Home Equity	12	12	Data Gap	Debt to Income (DTI) - The monthly principal, interest, tax, insurance (PITI) payment divided by the borrower(s) gross monthly income. Both Field #11 (Debt to Income DTI – Back-End) and Field #12 (Debt to Income DTI - Front-End) should be provided as measured at origination.	Original Frontend DTI must be a valid positive whole number		
Home Equity	53	53	Data Gap	Foreclosure Status – Identifies the current foreclosure status as of the end of the reporting month. • In foreclosure, pre-sale – Coded for any mortgage that has been referred to an attorney for loss mitigation proceedings but has not yet gone to foreclosure sale. • Post-sale Foreclosure – Coded for any loan where the bank has obtained title at foreclosure sale, but the property is not yet actively being marketed. Typically this will include loans that are in redemption or being repaired. If this information is not available, please code the loan as REO. • REO – Coded for any mortgage where the bank has obtained title at foreclosure sale and the property is on the market and available for sale. Also code instances where the bank has obtained title but the availability for sale is not known. 0 = Not in foreclosure 1 = In foreclosure, pre-sale 2 = Post-sale foreclosure, Redemption, non-REO (if available, otherwise REO) 3 = REO	Fields needed to calculate Delinquency Status must be populated		
Home Equity	106	75	Edit Check In Question	Loan Extension must be "Y", "N" for loans and blank for lines of credit, and "N" for Modifications with Term Extensions		Per discussion with LPS, this is a problem with the edit report logic.	Resolve logic issue

Home Equity	47	47.2	Data Gap	<p>Status of borrower payments (Current, 30, 60, 90 etc.) of loan. PLEASE NOTE: Indicators of Foreclosure, Bankruptcy and REO are also carried in this field. Note: The code value of T=Terminated Reporting is intended to keep track of loans which were part of the previous month's submission, and no longer available in current month's file. Such missing loans which are neither paid off nor liquidated in the current month will be captured by this code. As an example, if a loan has been sent to a collections agency in the reporting period, but not charged off or transferred to other servicer, it would be captured under this code value. In the case of loan which has been charged off and not moved to REO, the following codes will apply - Liquidation Status (Field #54) will have a code value of 2: involuntary liquidation, which includes charge off.</p> <p>C = Current 3 = 30 days 6 = 60 days 9 = 90+ days F = FC R = REO T = Terminated Reporting S = Servicing Sold Release 0 = Paid off U = Unknown</p>	Loan Status MBA must coincide with Next Payment Due Date and Status Codes		
Home Equity	199	11	Data Gap	Original Backend DTI must be a valid positive whole number		These are old loans or loans serviced by others that we do not have the orig DTI on and are mostly loans acquired by merger, conversion, etc.	Increase tolerances for loans originated more than 5 years ago
Home Equity	9	9	Data Gap	Original Combined LTV – The original combined loan-to-value (LTV) ratio is the original amount of the home equity loan (or credit line), in addition to any senior liens, divided by the property value at the time of loan origination. The committed loan amount (considering all senior liens and the subject loan) divided by the property value at the time of the HE origination.	Original CLTV must be greater than 0 and less than 1000%		
Home Equity	201	13	Data Gap	Original FICO must be a valid whole number between 300 and 899		These are old loans or loans serviced by others that we do not have the orig FICO on and are mostly loans acquired by merger, conversion, etc.	Increase tolerances for loans originated more than 5 years ago
Home Equity	6	6	Data Gap	Original Loan Amount - The dollar amount of the funds disbursed to the borrower at the time of loan closing. Amount of loan rounded to the nearest whole dollar. Report the dollar amount of the funds disbursed to the borrower at the time of loan closing. This data should be available either in BHCs' loan origination systems or loan servicing systems, and must be populated.	Original Loan Amount or Original Loan / Line Amount must be a valid whole number greater than or equal to 0		
Home Equity	196	8	Data Gap	Original Property Value must be a valid positive whole number		These are old loans or loans serviced by others that we do not have the orig value on and are mostly loans acquired by merger, conversion, etc.	Increase tolerances for loans originated more than 5 years ago

Home Equity	213	44	Edit Check In Question	Principal Balance must be a valid whole number greater than or equal to -500		Edit tolerance is only .01% . It is not uncommon to have loans that have a negative balance less than -500 in the process of being refunded to customer. These represent over-payments in the normal course of business.	Establish higher threshold that recognizes the justification (see comment).
Home Equity	84	84	Data Gap	Report the remaining term of the loan in months. For HELOC it should be the combined draw period and the repayment period. Note: For the Remaining Term fields in the FR Y-14M First Lien and Home Equity schedules, a value of 0 should be assigned if a loan is past maturity.	Remaining Term must be a number between 0 and 600 or 999		
First Lien	245	4	Edit Check In Question	Property State Must Be A Valid Postal Abbreviation of the 50 States, DC, or valid US Possession		Edit tolerance is only .01% which is very hard to achieve do to some manual entry. It is corrected each month.	Establish higher threshold that recognizes the justification (see comment).
First Lien	246	5	Edit Check In Question	Property ZIP Code Should Be 5 Digits		Edit tolerance is only .01% which is very hard to achieve do to some manual entry. It is corrected each month.	Establish higher threshold that recognizes the justification (see comment).
First Lien	6	6.3	Edit Check In Question	Original Loan Amount - The dollar amount of the funds disbursed to the borrower at the time of loan closing. Amount of loan rounded to the nearest whole dollar.	Original Loan Amount must be a valid positive whole number		Establish threshold that recognizes acquired or missing data
First Lien	8	8.1	Edit Check In Question	Original LTV – The original loan-to-value (LTV) ratio is the original loan amount divided by the lesser of the selling price or the appraised value of the property securing the mortgage at origination.	Loan is not a HARP loan and calculated original LTV is greater than or equal to 125%		Establish threshold that recognizes acquired or missing data
First Lien	250	13	Edit Check In Question	Original FICO must be a valid whole number between 300 and 899		These are primarily converted accounts where this information was not available on the legacy system.	Increase tolerances for loans originated more than 5 years ago

First Lien	19	19.3	Edit Check In Question	<p>Product Type – Identifies the product type of the mortgage including the interest type, amortization term and initial fixed period for hybrid products.</p> <p>Fixed 30 – Fixed rate amortizing loans with a 30 year loan term. Also include fixed rate loans where loan term is greater than 20 and less than 30 years.</p> <p>Fixed 20 – Fixed rate amortizing loans with a 20 year loan term. Also include fixed rate loans where loan term is greater than 15 and less than 20 years.</p> <p>Fixed 15 – Fixed rate amortizing loans with a 15 year loan term. Also include fixed rate loans where loan term is greater than 10 and less than 15 years.</p> <p>Fixed 10 – Fixed rate amortizing loans with a 10 year loan term. Also include fixed rate loans where loan term is less than 10 years.</p> <p>Fixed 40 – Fixed rate amortizing loans with a 40 year term. Also include fixed rate loans where loan term is greater than 30 and less than 40 years.</p> <p>Fixed Greater than 40 - Fixed rate loans with loan term greater than 40 years.</p> <p>Fixed Other – Fixed rate loan where the</p>	Product Type Other cannot exceed 5% of reported loans		Establish threshold that recognizes acquired or missing data
First Lien	273	20.1	Edit Check In Question	Purpose of Loan coded Unknown cannot exceed 5% of reported portfolio loans		These are primarily converted accts where this information was not available on the legacy system. Research is underway to determine if additional data can be used to lower the unknown category.	Increase tolerances for loans originated more than 5 years ago
First Lien	274	21.1	Edit Check In Question	Number of Units coded Unknown cannot exceed 5% of reported portfolio loans		These are primarily loans where we can not determine the number of units as defined by the instructions. There are also old loans where no information is available to determine number of units.	Increase tolerances for loans originated more than 5 years ago
First Lien	22	22	Edit Check In Question	For loans with loan level mortgage insurance coverage, provide the mortgage insurance coverage percent at origination.	MI Coverage Percent At Origination should be between 1% and 50%		Establish threshold that recognizes acquired or missing data
First Lien	23	23.1	Edit Check In Question	<p>Indicate the type of the property.</p> <p>1 = SFR 2 = Condo 3 = Co-Op 4 = 2-4 Units 5 = Townhouse 6 = PUD 7 = 5+ Units E = Commercial F = Mixed Use M = Manufactured Housing Z = Other U = Unknown</p>	Property type cannot change unless it was "U" or not provided	Property Type can change through the life of a loan as a result of coding clean-up/correction	Establish threshold that recognizes the justification (see comment).

First Lien	27	27.1	Edit Check In Question	Interest Only at Origination Flag - Indicates if the loan was an IO loan at the time of origination. That is, at origination, was the normal monthly payment for the loan just interest. An interest only (IO) mortgage is a nontraditional mortgage which allows the borrower to pay only the interest due on the loan for a specified number of years, and whose interest rate may fluctuate or be fixed. After the interest-only period, the rate may be fixed or fluctuate based on the prescribed index, with payments including both principal and interest.	Interest Only At Origination cannot change unless it was "U" or not provided	"Interest Only At Origination" can change through the life of a loan as a result of coding clean-up/correction	Establish threshold that recognizes the justification (see comment).
First Lien	258	37	Edit Check In Question	ARM Lifetime Rate Cap must be a number between 0.00001 and 0.99999 when loan is an ARM loan		A number of our ARM loans do not have a Lifetime Rate Cap.	Allow for blanks in this variable
First Lien	259	38	Edit Check In Question	ARM Lifetime Rate Floor must be a number between 0.00001 and 0.99999 when loan is an ARM loan		A number of our ARM loans do not have a Lifetime Rate Floor.	Allow for blanks in this variable
First Lien	56	56	Edit Check In Question	Current Interest Rate – The annual percentage rate of the mortgage as of the last day of the reporting month.	Current Interest Rate must be a number between 0.00001 and 0.24999	Interest Rates may exist that does not fall within this guideline (non-accrual rates, promotional rates, etc.)	Establish threshold that recognizes the justification (see comment).
First Lien	96	58	Edit Check In Question	Scheduled Principal Balance Amount must be a valid positive whole number		This edit does not allow for zero scheduled principal balances, which are valid if a loan is past maturity.	Modify edit to allow for zeros if the remaining term is le 0.
First Lien	65	65.1	Data Gap	Foreclosure Status – Identifies the current foreclosure status as of the end of the reporting month. • In foreclosure, pre-sale – Coded for any mortgage that has been referred to an attorney for loss mitigation proceedings but has not yet gone to foreclosure sale. • Post-sale Foreclosure – Coded for any loan where the bank has obtained title at foreclosure sale, but the property is not yet actively being marketed. Typically this will include loans that are in redemption or being repaired. If this information is not available, please code the loan as REO. • REO – Coded for any mortgage where the bank has obtained title at foreclosure sale and the property is on the market and available for sale. Also code instances where the bank has obtained title but the availability for sale is not known.	Loan in Foreclosure should not be current		

Additional General Considerations - Edit Checks

No	Institution Explanation	Comment	Recommendation
1	Example: Updated Borrower's Income for Credit Card Submission (the bank does not collect this data)	Is there a way for FED to pre-filter edits based on responses from previous submission (i.e., for those edits that will repeat quarter over quarter – around missing data or other anomalies)? We are working on automating a process on Bank side to do this.	Not require a response if we have responded to an edit check in previous period.
2		LPS Thresholds are unreasonable. 0.01% tolerance	Change threshold to 0.1% at a minimum

Schedule	Field Number	Edit Number	Edit Check Issue	Technical Field Name	Edit Test	Error Message Display	Justification / Explanation	Recommendations
Corporate	2	5	Edit Check In Question	InternalObligorID	InternalObligorID must not be null or zero.	InternalObligorID (field 2) was not provided or a value of 0 was submitted.	Some core banking systems do not have an "ObligorID" - therefore, this is a legitimate data gap.	When specific edit-check items can be explained, do not give the error in future months
Corporate	3	8	Edit Check In Question	OriginalInternalObligorID	OriginalInternalObligorID must not be null or zero.	OriginalInternalObligorID (field 3) was not provided or a value of 0 was submitted.	Some core banking systems do not have an "ObligorID" - therefore, this is a legitimate data gap.	When specific edit-check items can be explained, do not give the error in future months
Corporate	4	11	Data Gap	ObligorName	ObligorName must not be null.	ObligorName (field 4) was not provided.		
Corporate	5	13	Data Gap	City	City must not be null.	City (field 5) was not provided.		
Corporate	6	15	Data Gap	Country	Country must not be null.	Country (field 6) was not provided.		
Corporate	8	19	Data Gap	IndustryCode	IndustryCode must not be null.	IndustryCode (field 8) was not provided.		
Corporate	9	21	Data Gap	IndustryCodeType	IndustryCodeType must not be null.	IndustryCodeType (field 9) was not provided.		
Corporate	10	24	Data Gap	InternalRating	InternalRating must not be null.	InternalRating (field 10) was not provided.		
Corporate	11	26	Data Gap	TIN	TIN must not be null.	TIN (field 11) was not provided.		
Corporate	24	55	Edit Check In Question	CommittedExposure	CommittedExposure must not be null or negative.	CommittedExposure (field 24) was not provided or amount is negative.	Some transactions can have negative commitments (Syndications and/or Participations)	Adjust the edit check to allow negative commitments when the record is a "sold" transaction
Corporate	28	66	Data Gap	CumulativeChargeoffs	CumulativeChargeoffs must not be null.	CumulativeChargeoffs (field 28) was not provided.		
Corporate	30	72	Data Gap	ASC31010	ASC31010 must not be null or negative.	ASC31010 (field 30) was not provided or amount is negative.		
Corporate	31	75	Data Gap	ASC31030	ASC31030 must not be null or negative.	ASC31030 (field 31) was not provided or amount is negative.		
Corporate	19	127	Edit Check In Question	MaturityDate	The date reported for MaturityDate should be later than or equal to the quarter end date.	MaturityDate (field 19) should be later than or equal to the quarter end date (e.g. 2011-03-31).	Loans in workout or in the process of renewal/extension at quarter end fail this check. These are standard business processes and should not be considered errors.	Invalid logic, common business practices often create situations where a loan matures prior to the current reporting period-end.
Corporate	68	174	Edit Check In Question	TangibleAssets	TangibleAssets should be greater than or equal to the sum of CurrentAssetsCurrent and FixedAssets.	The sum of CurrentAssetsCurrent (field 66) and FixedAssets (field 69) should not exceed TangibleAssets (field 68).	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.	Logic should accept a tolerance for rounding differences.
Corporate	66	180	Edit Check In Question	CurrentAssetsCurrent	CurrentAssetsCurrent should be greater than or equal to the sum of CashMarketableSecurities, AccountsReceivableCurrent and InventoryCurrent.	The sum of CashMarketableSecurities (field 61), AccountsReceivableCurrent (field 62) and InventoryCurrent (field 64) should not exceed CurrentAssetsCurrent (field 66).	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.	Logic should accept a tolerance for rounding differences.
Corporate	67	183	Edit Check In Question	CurrentAssetsPriorYear	CurrentAssetsPriorYear should be greater than or equal to the sum of AccountsReceivablePriorYear and InventoryPriorYear.	The sum of AccountsReceivablePriorYear (field 63) and InventoryPriorYear (field 65) should not exceed CurrentAssetsPriorYear (field 67).	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.	Logic should accept a tolerance for rounding differences.
Corporate	33	189	Edit Check In Question	NonaccrualDate	If NonAccrualDate is not equal to 9999-12-31, then NonAccrualDate should be prior to the MaturityDate.	The date reported for the NonAccrualDate (field 33) should be prior to the date reported for the MaturityDate (field 19).	It is standard business practice for a loan to be placed on non accrual status after the maturity date. Non accrual date can be after maturity date if the borrower continues to pay interest after maturity or loan is in workout. These should not be errors.	Invalid logic, common business practices often create situations where a loan is placed on non-accrual after maturity. It is not often practical for us to make an accrual decision prior to maturity.
Corporate	12	206	Data Gap	StockExchange	StockExchange must not be null.	StockExchange (field 12) was not provided.		
Corporate	13	207	Data Gap	TKR	TKR must not be null.	TKR (field 13) was not provided.		
Corporate	14	208	Data Gap	CUSIP	CUSIP must not be null.	CUSIP (field 14) was not provided.		
Corporate	25	211	Edit Check In Question	UtilizedExposure		The sum of UtilizedExposure (field 25) should be less than or equal to FR Y-9C (HC-CM10a5B), for all loans where LineReportedOnFRY9C (field 26) is equal to 10 and FairValueAdjustment (field 29) is not equal to NA.	We find the CCAR Corporate Loan Schedule requirements to be in conflict with FRY9C requirement, and this edit invalid.	Recommend turning off this automated edit-check, in favor of providing a manual-reconciliation between the two fields
Corporate	44	218	Data Gap	GuarantorFlag	GuarantorFlag must equal 1, 2, 3 or 4.	GuarantorFlag (field 44) must equal 1, 2, 3 or 4.		
Corporate	45	223	Data Gap	GuarantorInternalID	GuarantorInternalID must not be null.	GuarantorInternalID (field 45) was not provided.		
Corporate	46	225	Data Gap	GuarantorName	GuarantorName must not be null.	GuarantorName (field 46) was not provided.		
Corporate	47	227	Data Gap	GuarantorTIN	GuarantorTIN must not be null.	GuarantorTIN (field 47) was not provided.		
Corporate	48	229	Data Gap	GuarantorInternalRiskRating	GuarantorInternalRiskRating must not be null.	GuarantorInternalRiskRating (field 48) was not provided.		
Corporate	8	303	Edit Check In Question	IndustryCode		For the the current and previous quarter the IndustryCode (field 8) does not match for the same InternalCreditFacilityID (field 15), InternalObligorID (field 2) and IndustryCodeType (field 9).	This value changes as part of the normal course of business. Trend is as expected.	Establish a tolerance that recognizes some codes change - as a result of coding corrections and/or borrower changes.

Corporate	11	305	Edit Check In Question	TIN	If InternalCreditFacilityID (current quarter) is equal to InternalCreditFacilityID (previous quarter) and InternalObligorID (current quarter) is equal to InternalObligorID (previous quarter) then the TIN (current quarter) should be equal to TIN (previous quarter).	For the the current and previous quarter the TIN (field 11) does not match for the same InternalCreditFacilityID (field 15) and InternalObligorID (field 2).		Establish a tolerance that recognizes some codes change - as a result of coding corrections and/or borrower changes.
Corporate	18	309	Edit Check In Question	OriginationDate	If InternalCreditFacilityID (current quarter) is not equal to an InternalCreditFacilityID (previous quarter) and OriginalInternalCreditFacilityID (current quarter) is not equal to an InternalCreditFacilityID (previous quarter) then the OriginationDate (current quarter) must be after the previous quarter reporting date.	New loan submissions for this reporting period should have an OriginationDate between previous and current report period	These loans originated previously but did not meet the submission requirements previously. Primarily commitment increases.	Establish a tolerance that recognizes some loans may move between schedules or become applicable to CCAR reporting thresholds after origination.
Corporate	16	310	Edit Check In Question	OriginalInternalCreditFacilityID	If InternalCreditFacilityID (current quarter) is equal to InternalCreditFacilityID (previous quarter) then the OriginalInternalCreditFacilityID (current quarter) should be equal to OriginalInternalCreditFacilityID (previous quarter).	For the the current and previous quarter the OriginalInternalCreditFacilityID (field 16) does not match for the same InternalCreditFacilityID (field 15).	Per instruction for item 16 OriginalInternalCreditFacilityID (The Internal identification code assigned to the credit facility record in the previous submission), if a facility's ID changes (e.g. due to systems conversion), the reporting should look as follows. Assume that Loan ABC converts during Q2 and has a new identifier of DEF: Q1 Original Credit Internal Facility ID (field 16) = ABC Q1 Credit Internal Facility ID (field 15) = ABC Q2 Original Credit Internal Facility ID (field 16) = ABC <<Conversion occurs on 4/15/2013>> Q2 Credit Internal Facility ID (field 15) = DEF Q3 Original Credit Internal Facility ID (field 16) = DEF Q3 Credit Internal Facility ID (field 15) = DEF. This edit rule will fail this record in the Q3 2013 QA file, but this is a legitimate situation.	The way bank's deal with changes to CreditFacilityIDs and the subsequent OriginalInternal CreditFacilityIDs is such that the logic for this edit check will create false-positive errors. We recommend that this edit-check be turned-off.
Corporate	18	311	Edit Check In Question	OriginationDate	If InternalCreditFacilityID (current quarter) is equal to InternalCreditFacilityID (previous quarter) then the OriginationDate (current quarter) should be equal to OriginationDate (previous quarter).	For the the current and previous quarter the OriginationDate (field 18) does not match for the same InternalCreditFacilityID (field 15).	Loans are routinely extended and renewed, while keeping the same loan number, and this check does not take this into account, making any extension or renewal an error, which they are not.	One solution would be to only flag situations where the Origination Date moved backward since the prior quarter, but allow situations when the Origination Date moves forward (but remains prior to the as of date). If the loan has renewed or extended (as identified by other fields in the schedule), then this edit check should not be applicable.
Corporate	19	312	Edit Check In Question	MaturityDate	If InternalCreditFacilityID (current quarter) is equal to InternalCreditFacilityID (previous quarter) then the MaturityDate (current quarter) should be equal to MaturityDate (previous quarter).	For the the current and previous quarter the MaturityDate (field 19) does not match for the same InternalCreditFacilityID (field 15).	Loans are routinely extended and renewed, while keeping the same loan number, and this check does not take this into account, making any extension or renewal an error, which they are not. One solution would be to allow a certain degree of change for the Maturity Date. We believe there is enough information to filter out those credit facilities where maturity date was extended and origination date changed indicating a renewal. (goes with Edit #311 above)	Edit check should allow changes in the maturity date to allow short-term extension 90-120 days without creating an alert.
Corporate	20	313	Edit Check In Question	FacilityType		For the the current and previous quarter the FacilityType (field 20) does not match for the same InternalCreditFacilityID (field 15).	This value changes as part of the normal course of business. Trend is as expected.	Establish a tolerance that recognizes some codes change - as a result of coding corrections and/or borrower changes.
Corporate	27	318	Edit Check In Question	LineOfBusiness		For the the current and previous quarter the LineOfBusiness (field 27) does not match for the same InternalCreditFacilityID (field 15).	This value changes as part of the normal course of business. Trend is as expected.	Establish a tolerance that recognizes some codes change - as a result of coding corrections and/or borrower changes.

Corporate	37	326	Edit Check In Question	InterestRateVariability	If InternalCreditFacilityID (current quarter) is equal to InternalCreditFacilityID (previous quarter) and InterestRateVariability (previous quarter) equals 1, 2, or 3, then InterestRateVariability (previous quarter) should equal InterestRateVariability (current quarter).	For the same InternalCreditFacilityID (field 15), if InterestRateVariability (field 37) previous quarter equals 1, 2, or 3, then InterestRateVariability (field 37) previous quarter should equal InterestRateVariability (field 37) for the current quarter.	When loans go from funded to unfunded, or vice versa, they should not trip quarter over quarter interest rate checks.	Edit check should consider if the funded amount is zero in current quarter - and no longer expect InterestRateVariability to match prior quarter.
Corporate	39	328	Edit Check In Question	InterestRateIndex	If InternalCreditFacilityID (current quarter) is equal to InternalCreditFacilityID (previous quarter) and InterestRateIndex (previous quarter) equals 1, 2, 3, 4, 5 or 6, then InterestRateIndex (previous quarter) should equal InterestRateIndex (current quarter).	For the same InternalCreditFacilityID (field 15), if InterestRateIndex (field 39) previous quarter equals 1, 2, 3, 4, 5 or 6, then InterestRateIndex (field 39) previous quarter should equal InterestRateIndex (field 39) for the current quarter.	When loans go from funded to unfunded, or vice versa, they should not trip quarter over quarter interest rate checks. This value changes as part of the normal course of business. Trend is as expected.	Edit check should consider if the funded amount is zero in current quarter - and no longer expect InterestRateIndex to match prior quarter.
Corporate	70	330	Edit Check In Question	TotalAssetsCurrent	TotalAssetsCurrent should be greater than or equal to TangibleAssets.	TangibleAssets (field 68) should not exceed TotalAssetsCurrent (field 70).	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.	Logic should accept a tolerance for rounding differences.
Corporate	71	331	Edit Check In Question	TotalAssetsPriorYear	TotalAssetsPriorYear should be greater than or equal to CurrentAssetsPriorYear.	CurrentAssetsPriorYear (field 67) should not exceed TotalAssetsPriorYear (field 71).	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.	Logic should accept a tolerance for rounding differences.
Corporate	76	332	Edit Check In Question	CurrentLiabilitiesCurrent	CurrentLiabilitiesCurrent should be greater than or equal to the sum of AccountsPayableCurrent, ShortTermDebt and CurrentMaturitiesLongTermDebt.	The sum of AccountsPayableCurrent (field 72), ShortTermDebt (field 74) and CurrentMaturitiesLongTermDebt (field 75) should not exceed CurrentLiabilitiesCurrent (field 76).	Any edit that compares dollar amount fields should have a degree of rounding tolerance built in. Right now amounts that are off by even \$1 fail the checks.	Logic should accept a tolerance for rounding differences.

Schedule	Field Number	Edit Number	Edit Check Issue	Technical Field Name	Edit Test	Error Message Display	Justification / Explanation	Recommendations
CRE	3	9	Edit Check In Question	OutstandingBalance		OutstandingBalance must be a positive numeric whole number	Some transactions can have negative balance (Syndications and/or Participations)	Adjust the edit check to allow negative balance when the record is a "sold" transaction
CRE	5	15	Edit Check In Question	CommittedBalance		CommittedBalance must be positive numeric and a whole number	Some transactions can have negative commitments (Syndications and/or Participations)	Adjust the edit check to allow negative commitments when the record is a "sold" transaction
CRE	12	34	Data Gap	NetOperatingIncome	NetOperatingIncome must be numeric or NA if LineReportedOnFRY9C IN (1,2,7), and must be numeric if LineReportedOnFRY9C IN (3,5), and must be NA if LineReportedOnFRY9C IN (4).The value of 4 is valid from 2011-09-30 to 2012-03-31. The value of 6 is valid from 2009-12-31 to 2011-06-30.	NetOperatingIncome must be numeric or NA if LineReportedOnFRY9C IN (1,2,7), and must be numeric if LineReportedOnFRY9C IN (3,5), and must be NA if LineReportedOnFRY9C IN (4).The value of 4 is valid from 2011-09-30 to 2012-03-31. The value of 6 is valid from 2009-12-31 to 2011-06-30.		
CRE	15	43	Data Gap	InternalRating		InternalRating must be provided		
CRE	19	55	Data Gap	MaturityDate		MaturityDate should not be prior to 2000		
CRE		66	Data Gap	CurrentOccupancy	CurrentOccupancy must be provided and ≥ 0 and ≤ 1 or NA	CurrentOccupancy must be provided and ≥ 0 and ≤ 1 or NA		
CRE	30	87	Data Gap	InterestRateCeiling		If InterestRateVariability ≤ 1 (not fixed), then InterestRateCeiling must be ≥ 0 and ≤ 1 , or 0 if OutstandingBalance (field #3) = 0 and CommittedBalance (field #5) > 0, or NONE. If InterestRateVariability = 1 (fixed), then InterestRateCeiling must be NA.		
CRE	31	90	Data Gap	InterestRateFloor		If InterestRateVariability ≤ 1 (not fixed), then InterestRateFloor must be ≥ 0 and ≤ 1 , or 0 if OutstandingBalance (field #3) = 0 and CommittedBalance (field #5) > 0, or NONE. If InterestRateVariability = 1 (fixed), then InterestRateFloor must be NA.		
CRE	33	95	Data Gap	InterestReserves		InterestReserves must be provided		
CRE	29	104	Data Gap	InterestRateSpread		InterestRateSpread must be ≥ -1 and ≤ 1 if InterestRateVariability ≤ 1 , or InterestRateSpread must equal NA if InterestRateVariability = 1 (fixed)		
CRE	3	112	Edit Check In Question	OutstandingBalance		OutstandingBalance must not be multiple of 10 from prior quarter. For example, the prior quarter was 10 and the current quarter was 100. $100 / 10 = 10$.		Edit check should allow large balance changes when the prior quarter balance was small. Establish a tolerance for balance changes quarter over quarter.
CRE	5	115	Edit Check In Question	CommittedBalance		CommittedBalance must not be multiple of 10 from prior quarter. For example, the prior quarter was 10 and the current quarter was 100. $100 / 10 = 10$.		Edit check should allow large commitment changes when the prior quarter commitment was small. Establish a tolerance for balance changes quarter over quarter.
CRE	12	123	Edit Check In Question	NetOperatingIncome		NetOperatingIncome should not be negative	Negative NOI can be legitimate. For instance, Negative NOI is accurate based on 2011 data - borrower has property listed for sale. From instructions: "...but negative numbers can be submitted"	Establish tolerance for accepting legitimate instances where the Borrower actually has negative income.
CRE	12	127	Data Gap	NetOperatingIncome		30 yr amort DSC is greater than 200: $(\text{NetOperatingIncome} / 12) / (\text{pmt}(\text{PV}=\text{CommittedBalance}+\text{CumulativeChargeoffs}, \text{FV}=0, \text{N}=360, \text{Int}=\text{InterestRate} / 12))$		
CRE	29	129	Data Gap	InterestRateSpread		If InterestRateSpread is not 'NA', Then InterestRateSpread should be less than or equal to InterestRate		
CRE	6	131	Edit Check In Question	CumulativeChargeoffs		CumulativeChargeoffs must not be multiple of 10 from prior quarter. For example, the prior quarter was 10 and the current quarter was 100. $100 / 10 = 10$.		Edit check should allow large changes to cumulative charge-offs when the prior quarter balance was small. Establish a tolerance for cumulative charge-off changes quarter over quarter.

CRE	35	140	Edit Check In Question	OrigLoanNumber		If Acq Loan= 2 and OriginationDate is < the first date of the reporting quarter, then OrigLoanNumber Must Exist In Previous Quarter Loan Number field.	1Q2013 original loan number = Q42012 loan number. We do not understand this error. We believe we are handling correctly in light of the ability to match credit facility records as indicated in our explanation.	
CRE	12	141	Edit Check In Question	NetOperatingIncome	If Current quarter (CrossCollateralizedLoan, LineReportedOnY9C, and OriginationDate) is equal to Prior quarter (CrossCollateralizedLoan, LineReportedOnY9C, and OriginationDate) then current quarter NetOperatingIncome must equal to prior quarter NetOperatingIncome.	If Current quarter (CrossCollateralizedLoan, LineReportedOnY9C, and OriginationDate) is equal to Prior quarter (CrossCollateralizedLoan, LineReportedOnY9C, and OriginationDate) then current quarter NetOperatingIncome must equal to prior quarter NetOperatingIncome.	we often receives updated NOI values on an annual basis, so they are routinely updated even though the Origination Date doesn't change. It would be appropriate to add a comparison of the Last NOI Date into this check also.	
CRE		143	Edit Check In Question	MaturityDate	If the current OriginationDate is the same as prior quarter, then current MaturityDate must equal to prior quarter.	If the current OriginationDate is the same as prior quarter, then current MaturityDate must equal to prior quarter.		Edit check should allow changes in the maturity date to allow short-term extension 90-120 days without creating an alert. The origination date will not change on extensions.
CRE		144	Edit Check In Question	Amortization	If the current OriginationDate is the same as prior quarter, then current Amortization must equal to prior quarter.	If the current OriginationDate is the same as prior quarter, then current Amortization must equal to prior quarter.		Edit check should accept that Modifications occur which change the amortization. Establish a tolerance for this type of change.
CRE		151	Data Gap	ValueAtOrigination	If the current OriginationDate is the same as prior quarter, then current ValueAtOrigination must equal to prior quarter.	If the current OriginationDate is the same as prior quarter, then current ValueAtOrigination must equal to prior quarter.		
CRE	39	156	Data Gap	PropertySize	PropertySize must be (numeric and a whole number) or NA	PropertySize must be (numeric and a whole number) or NA		
CRE	39	157	Edit Check In Question	PropertySize	If the current OriginationDate is the same as prior quarter, then current PropertySize must equal to prior quarter.	If the current OriginationDate is the same as prior quarter, then current PropertySize must equal to prior quarter.		Edit check should allow tolerance for instances when re-appraisal reflects that the property size has changed.
CRE		158	Data Gap	CurrentNetOperatingInc	CurrentNetOperatingIncome must be numeric or NA if LineReportedOnFRY9C IN (1,2,7), and must be numeric if LineReportedOnFRY9C IN (3,5). The value of 4 is valid for 2011-12-31 to 2012-03-31.	CurrentNetOperatingIncome must be numeric or NA if LineReportedOnFRY9C IN (1,2,7), and must be numeric if LineReportedOnFRY9C IN (3,5). The value of 4 is valid for 2011-12-31 to 2012-03-31.		
CRE	40	160	Edit Check In Question	CurrentNetOperatingInc		CurrentNetOperatingInc should not be negative	Negative Current NOIs can be legitimate. From instructions: "...but negative numbers can be submitted"	Establish tolerance for accepting legitimate instances where the Borrower actually has negative income.
CRE	40	162	Data Gap	CurrentNetOperatingInc		30 yr amort DSC is greater than 200: (CurrentNetOperatingInc / 12) / (pmt(PV=CommittedBalance+CumulativeChargeoff, FV=0, N=360, Int=InterestRate / 12))		
CRE		163	Data Gap	CurrentNetOperatingInc	If prior quarter CurrentNetOperatingInc was a numeric value and prior quarter LineReportedOnY9C equals current quarter LineReportedOnY9C, then current quarter must not be NA or null.	If prior quarter CurrentNetOperatingInc was a numeric value and prior quarter LineReportedOnY9C equals current quarter LineReportedOnY9C, then current quarter must not be NA or null.		
CRE	41	166	Edit Check In Question	LastNOIDate		If CurrentNetOperatingInc is not "NA", then LastNOIDate should be less than maturity date	Loans that have passed their maturity date are often in workout, in which case the bank routinely receives updated financial statements.	Invalid check, NOIDate cannot be checked for validity against Maturity Date
CRE	43	174	Edit Check In Question	LastValuationDate		LastValuationDate should be less than maturity date	Loans that have passed their maturity date are often in workout, in which case the bank routinely receives updated appraisals. Most of the records have no value. The rest have an evaluation date after maturity.	Invalid check, LastValuationDate cannot be checked for validity against Maturity Date
CRE	46	184	Data Gap	ASC31010		ASC31010 should not be negative		
CRE	47	185	Data Gap	ASC31030		ASC31030 should not be negative		

CRE	48	186	Data Gap	FairValueAdjustment		Count of FairValueAdjustment=0 and NULL should be less than 100% of total loan count.		
CRE	46	187	Data Gap	ASC31010		Count of ASC31010= 0 and NULL should be less than 100% of total loan count.		
CRE	27	188	Data Gap	InterestRate		Interest rate should not be greater than 20%		
CRE	3	192	Edit Check In Question	OutstandingBalance	For all loans reported by institution where LineReportedOnFRY9C is equal to 2, then the sum of OutstandingBalance should be less than or equal to HC-C1a2(BHCKF159) on FRY9C times 1000.	For all loans reported by institution where LineReportedOnFRY9C is equal to 2, then the sum of OutstandingBalance should be less than or equal to HC-C1a2(BHCKF159) on FRY9C times 1000.		Recommend turning off this automated edit-check, in favor of providing a manual-reconciliation between the two fields
CRE	25	231	Edit Check In Question	LoanPurpose		If LineReportedOnFRY9C equals (3 or 5), then LoanPurpose should not equal (1,2,3,or 5)	According to the requirements, the LoanPurpose is to be the loan purpose at origination/renewal. However, loans can change Y9C lines outside of origination/renewal (e.g. moving from construction to non-construction).	Establish tolerance for accepting legitimate instances where the Purpose Code changes
CRE	47	232	Edit Check In Question	ASC31030		Count of ASC31030 = 0 and NULL should be less than 100% of total loan count.	We do not have any loans that meet the ASC 310-30 condition. We submitted zeros on all loans and blanks on the cross collateralized records	When specific edit-check items can be explained, do not give the error in future months

Schedule	Field Number	Edit Number	Edit Check Issue	Technical Field Name	Edit Test	Error Message Display	Justification / Explanation	Recommendations
USSB	41		Edit Check in Question	D_BANKRUPTCY_CO	D_BANKRUPTCY_CO must not be negative.	D_BANKRUPTCY_CO must not have a negative value.	When recoveries exceed the original charged-off amount, this field can become negative. This negative charge-off amount eventually gets refunded to the customer, but while it is on the books - appears as a negative charge-off balance.	Establish a threshold that recognizes the occurrence negative charge-off balances for a time.
USSB	5	35	Edit Check in Question	D_COMMITMENTS	D_COMMITMENTS must not be negative.	D_COMMITMENTS must not have a negative value.	Since the commitment is linked to the balance, if the D_OS is negative than the D_COMMITMENTS will also be negative. An account may overpay or have a credit applied to the account and show as a negative outstanding balance amount.	Establish a threshold that recognizes the occurrence negative commitments.
USSB	7	39	Edit Check in Question	D_GROSS_CONTRACTUAL_CO	D_GROSS_CONTRACTUAL_CO must not be negative.	D_GROSS_CONTRACTUAL_CO must not have a negative value.	Negative charge-off and recovery values can result from several actions. An account that has gone to charge-off can be brought out of charge-off with a manual reversal entry, causing a negative charge-off. Manual reversal entries can occur if a customer pays on the loan after it has gone to charge-off.	Establish a threshold that recognizes the occurrence negative charge-off balances for a time.
USSB	37		Data Gap	D_MODIFICATIONS	D_MODIFICATIONS must not be negative.	D_MODIFICATIONS must not have a negative value.		
USSB	4	34	Edit Check in Question	D_NEW_ACCOUNTS	D_OS must be greater than or equal to D_NEW_ACCOUNTS.	D_NEW_ACCOUNTS must not be greater than D_OS.	An account may charge new volume and return or pay it down in the same month - which would make the D_New_Accounts greater than D_OS.	Establish threshold the recognizes the justification (see comment).
USSB	2	24	Edit Check in Question	D_OS	D_OS must not be negative.	D_OS must not have a negative value.	An account may overpay, have a credit applied to the account, or be guaranteed and show as a negative outstanding account balance.	Establish threshold the recognizes the justification (see comment).
USSB	2	26	Edit Check in Question	D_OS	If N_ACCT is greater than zero, then D_OS must be equal or greater than zero.	N_ACCT is greater than zero so D_OS must be equal or greater than zero.	An account may overpay or have a credit applied to the account and show as a negative outstanding account balance.	Establish threshold the recognizes the justification (see comment).
USSB	43		Edit Check in Question	D_RECOVERIES	D_RECOVERIES must not be negative.	D_RECOVERIES must not have a negative value.	Reversal of recovery in subsequent month can cause this field to be negative.	Establish threshold the recognizes the justification (see comment).

Schedule	Field Number	Edit Number	Edit Check Issue	Technical Field Name	Edit Test	Error Message Display	Justification / Explanation	Recommendations
USOthCons	42		Edit Check In Question	D_BKCO	D_BKCO must not be negative.	D_BKCO must not have a negative value.	When recoveries exceed the original charged-off amount, this field can become negative. This negative charge-off amount eventually gets refunded to the customer, but while it is on the books - appears as a negative charge-off balance.	Establish threshold the recognizes the justification (see comment).
USOthCons	41		Edit Check In Question	D_GCO	D_GCO must not be negative.	D_GCO must not have a negative value.	When recoveries exceed the original charged-off amount, this field can become negative. This negative charge-off amount eventually gets refunded to the customer, but while it is on the books - appears as a negative charge-off balance.	Establish threshold the recognizes the justification (see comment).
USOthCons			Data Gap	D_NEW_COMMITMENTS	If N_NEW_ACCOUNTS is greater than zero, then D_NEW_COMMITMENTS must be greater than zero.	N_NEW_ACCOUNTS is greater than zero so D_NEW_COMMITMENTS must be greater than zero.		
USOthCons	2	33	Edit Check In Question	D_OS	If N_ACCT is greater than zero, then D_OS must be greater than zero.	N_ACCT is greater than zero so D_OS must be greater than zero.	Revolving accounts within the U.S. Other Consumer population are commonly active but may have a \$0 balance	Recommend discontinuation of this edit because the existence of a commitment does not require the existence of an outstanding amount.
USOthCons		31	Edit Check In Question	D_OS	D_OS must not be negative.	D_OS must not have a negative value.	Segments with small number of loans can have a negative balance due to customer over-payments.	Establish threshold the recognizes the justification (see comment).
USOthCons		33	Edit Check In Question	D_OS	If N_ACCT is greater than zero, then D_OS must be greater than zero.	N_ACCT is greater than zero so D_OS must be greater than zero.	Revolving Acct can be open/active but have a current zero outstanding balance.	Recommend discontinuation of this edit because the existence of an account does not require the existence of an outstanding amount.
USOthCons	5	43	Edit Check In Question	D_RECOVERIES	D_RECOVERIES must not be negative.	D_RECOVERIES must not have a negative value.	Negative charge-off and recovery values can result from several actions. An account that has gone to charge-off can be brought out of charge-off with a manual reversal entry, causing a negative charge-off. Manual reversal entries can occur if a customer pays on the loan after it has gone to charge-off.	Establish threshold the recognizes the justification (see comment).

Schedule	Field Number	Edit Number	Edit Check Issue	Technical Field Name	Edit Test	Error Message Display	Justification / Explanation	Recommendations
Auto		83	Edit Check In Question	D_ACCT_EVER_30DPD_LAST12	D_ACCT_EVER_30DPD_LAST12 must not be negative.	D_ACCT_EVER_30DPD_LAST12 must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		85	Edit Check In Question	D_ACCT_EVER_30DPD_LAST12	D_OS must be greater than or equal to D ACCT EVER 30DPD LAST12.		When a segment is reducing over time - and eventually becomes zero - the amount 30DPD in the last 12 months will acceptably be greater than the current outstanding in the segment.	Establish threshold the recognizes the justification (see comment).
Auto		86	Edit Check In Question	D_ACCT_EVER_60DPD_LAST12	D_ACCT_EVER_60DPD_LAST12 must not be negative.	D_ACCT_EVER_60DPD_LAST12 must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		88	Edit Check In Question	D_ACCT_EVER_60DPD_LAST12	D_OS must be greater than or equal to D ACCT EVER 60DPD LAST12.		When a segment is reducing over time - and eventually becomes zero - the amount 60DPD in the last 12 months will acceptably be greater than the current outstanding in the segment.	Establish threshold the recognizes the justification (see comment).
Auto	13	75	Edit Check In Question	D_BANKRUPTCY_CO	D_BANKRUPTCY_CO must not be negative.	D_BANKRUPTCY_CO must not have a negative value.	Negative charge-off and recovery values can result from several actions. An account that has gone to charge-off can be brought out of charge-off with a manual reversal entry, causing a negative charge-off. Manual reversal entries can occur if a customer pays on the loan after it has gone to charge-off. In addition, expenses that occur during the repossession process can cause negative charge-offs or recoveries. The repossession expenses include towing fees, impound fees, auction fees, insurance claim fees, etc.	Establish threshold the recognizes the justification (see comment).
Auto	11	72	Edit Check In Question	D_CUR_MONTH_REPO	If N_ACCT is equal to null or zero, then D_CUR_MONTH_REPO must equal null or zero.	A null or a zero value was provided for N_ACCT so D_CUR_MONTH_REPO must also have a value of null or zero.	A vehicle may be repossessed and sold in the same month. The d_cur_month_repo gets populated since the vehicle is repossessed but the n_act reverts to 0 since the record is no longer an active loan.	Allow a small variance for D_Repo to be positive if there are no D CUR MONTH REPO in the segment.
Auto		71	Edit Check In Question	D_CUR_MONTH_REPO	D_CUR_MONTH_REPO must not be negative.	D_CUR_MONTH_REPO must not have a negative value.	When a segment with a small number/balance of loans has a repossession which exceeds the amount outstanding, until the amounts are refunded to the Borrower, the balance in the segment will be negative for this field.	Establish threshold the recognizes the justification (see comment).
Auto	12	73	Edit Check In Question	D_GROSS_CONTRACTUAL_CO	D_GROSS_CONTRACTUAL_CO must not be negative.	D_GROSS_CONTRACTUAL_CO must not have a negative value.	Negative charge-off and recovery values can result from several actions. An account that has gone to charge-off can be brought out of charge-off with a manual reversal entry, causing a negative charge-off. Manual reversal entries can occur if a customer pays on the loan after it has gone to charge-off. In addition, expenses that occur during the repossession process can cause negative charge-offs or recoveries. The repossession expenses include towing fees, impound fees, auction fees, insurance claim fees, etc.	Establish threshold the recognizes the justification (see comment).
Auto		109	Edit Check In Question	D_JOINT_APPLICATION	D_JOINT_APPLICATION must not be negative.	D_JOINT_APPLICATION must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		111	Edit Check In Question	D_JOINT_APPLICATION	D_OS must be greater than or equal to D JOINT APPLICATION.		Some loans in the segment could have negative balances, making the D_JOINT_APPLICATION greater than the total D_OS in segment.	Allow for small variances to allow for negative balances
Auto		106	Edit Check In Question	D_LOSS_MITIGATION	D_LOSS_MITIGATION must not be negative.	D_LOSS_MITIGATION must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		108	Edit Check In Question	D_LOSS_MITIGATION	D_OS must be greater than or equal to D LOSS MITIGATION.		When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).

Auto		54	Edit Check In Question	D_NEW_ACCOUNTS	D_OS must be greater than or equal to D_NEW_ACCOUNTS.		When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		103	Edit Check In Question	D_ORIG_CHANNEL_DIRECT	D_ORIG_CHANNEL_DIRECT must not be negative.	D_ORIG_CHANNEL_DIRECT must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		105	Edit Check In Question	D_ORIG_CHANNEL_DIRECT	D_OS must be greater than or equal to D_ORIG_CHANNEL_DIRECT.		When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		97	Edit Check In Question	D_ORIG_TERM_49_60	D_ORIG_TERM_49_60 must not be negative.	D_ORIG_TERM_49_60 must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		99	Edit Check In Question	D_ORIG_TERM_61_72	D_ORIG_TERM_61_72 must not be negative.	D_ORIG_TERM_61_72 must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		101	Edit Check In Question	D_ORIG_TERM_G_72	D_ORIG_TERM_G_72 must not be negative.	D_ORIG_TERM_G_72 must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		95	Edit Check In Question	D_ORIG_TERM_LE_48	D_ORIG_TERM_LE_48 must not be negative.		When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		42	Edit Check In Question	D_OS	D_OS must not be negative.	D_OS must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		44	Edit Check In Question	D_OS	If N_ACCT is greater than zero, then D_OS must be greater than zero.	N_ACCT is greater than zero so D_OS must be greater than zero.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		45	Edit Check In Question	D_OS	D_OS must be greater than or equal to the sum of D_VEHICLE_TYPE_CAR_VAN, D_VEHICLE_TYPE_SUV_TRUCK, D_VEHICLE_TYPE_SPORT and D_VEHICLE_TYPE_UNKNOWN.		Edit fails if the sum of the components of off on the 6th place to right of the decimal. This outage is due to rounding.	Logic should accept a tolerance for rounding differences.
Auto		46	Edit Check In Question	D_OS	D_OS must be greater than or equal to the sum of D_ORIG_TERM_LE_48, D_ORIG_TERM_49_60, D_ORIG_TERM_61_72 and D_ORIG_TERM_G_72.		Edit fails if the sum of the components of off on the 6th place to right of the decimal. This outage is due to rounding.	Logic should accept a tolerance for rounding differences.
Auto	14	77	Edit Check In Question	D_RECOVERIES	D_RECOVERIES must not be negative.	D_RECOVERIES must not have a negative value.	Negative charge-off and recovery values can result from several actions. An account that has gone to charge-off can be brought out of charge-off with a manual reversal entry, causing a negative charge-off. Manual reversal entries can occur if a customer pays on the loan after it has gone to charge-off. In addition, expenses that occur during the repossession process can cause negative charge-offs or recoveries. The repossession expenses include towing fees, impound fees, auction fees, insurance claim fees, etc.	Establish threshold the recognizes the justification (see comment).

Auto	10	69	Edit Check In Question	D_REPO	If D_CUR_MONTH_REPO is greater than zero then D_REPO must be greater than zero.	The reported value for D_CUR_MONTH_REPO is greater than zero so D_REPO must be greater than zero.	The D_REPO field represents the legal balance of a repossession account as of month-end. The D_CUR_MONTH_REPO field is the balance at the time of repossession, which is often higher than the legal balance. For instance, a car was in Repo on day 3 of the month, later the auto was auctioned and out of Repo inventory. In this example, D_REPO doesn't include this auto balance at the month-end; however, the D_CUR_MONTH_REPO include this auto balance in it.	Establish threshold the recognizes the justification (see comment).
Auto	10	70	Edit Check In Question	D_REPO	D_REPO must be greater than or equal to D_CUR_MONTH_REPO.	The reported value for D_CUR_MONTH_REPO must not be greater than D_REPO.	The D_REPO field represents the legal balance of a repossession account as of month-end. The D_CUR_MONTH_REPO field is the balance at the time of repossession, which is often higher than the legal balance. For instance, a car was in Repo on day 3 of the month, later the auto was auctioned and out of Repo inventory. In this example, D_REPO doesn't include this auto balance at the month-end; however, the D_CUR_MONTH_REPO include this auto balance in it.	Establish threshold the recognizes the justification (see comment).
Auto	10	66	Edit Check In Question	D_REPO	D_REPO must not be negative.	D_REPO must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto	10	67	Edit Check In Question	D_REPO	If N_ACCT is equal to null or zero, then D_REPO must equal null or zero.		Since repos are not considered active loans, the N_accts can be zero and D Repo positive	Establish threshold the recognizes the justification (see comment).
Auto	10	68	Edit Check In Question	D_REPO	D_OS must be greater than or equal to D_REPO.		Since repos are not considered active loans, the D_OS can be zero and D Repo positive	Establish threshold the recognizes the justification (see comment).
Auto		58	Edit Check In Question	D_VEHICLE_TYPE_CAR_VAN	D_VEHICLE_TYPE_CAR_VAN must not be negative.	D_VEHICLE_TYPE_CAR_VAN must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		62	Edit Check In Question	D_VEHICLE_TYPE_SPORT	D_VEHICLE_TYPE_SPORT must not be negative.	D_VEHICLE_TYPE_SPORT must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		60	Edit Check In Question	D_VEHICLE_TYPE_SUV_TRUCK	D_VEHICLE_TYPE_SUV_TRUCK must not be negative.	D_VEHICLE_TYPE_SUV_TRUCK must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).
Auto		64	Edit Check In Question	D_VEHICLE_TYPE_UNKNOWN	D_VEHICLE_TYPE_UNKNOWN must not be negative.	D_VEHICLE_TYPE_UNKNOWN must not have a negative value.	When a segment with a small number/balance of loans has over payments which exceed the amount outstanding, until those overpayments are refunded to the Borrower, the balance in the segment will be negative.	Establish threshold the recognizes the justification (see comment).

Schedule	Field Number	Edit Number	Edit Check Issue	Technical Field Name	Edit Test	Error Message Display	Justification / Explanation	Recommendations
Home Equity	41	41	Edit Check In Question	Current Interest Rate	Current Interest Rate – The annual percentage rate of the loan as of the last day of the reporting month.	Current Interest Rate must be a number between 0.00001 and 0.24999	Interest Rates may exist that does not fall within this guideline (non-accrual rates, promotional rates, etc.)	Establish threshold that recognizes the justification (see comment).
Home Equity	11	11	Data Gap	Debt to Income (DTI) Back-End at Origination	Debt to Income (DTI) - The total monthly liabilities of the borrower, including the debt on the subject property, divided by the total monthly income of the borrower(s). Note, both Field #11 (Debt to Income DTI –Back-End) and Field #12 (Debt to Income DTI - Front-End) should be provided as measured at origination. This field may be provided on a best efforts basis for loans serviced for others and loans acquired through mergers and acquisitions.	Original Backend DTI must be a valid positive whole number		
Home Equity	12	12	Data Gap	Debt to Income (DTI) Front-End at Origination	Debt to Income (DTI) - The monthly principal, interest, tax, insurance (PITI) payment divided by the borrower(s) gross monthly income. Both Field #11 (Debt to Income DTI – Back-End) and Field #12 (Debt to Income DTI - Front-End) should be provided as measured at origination.	Original Frontend DTI must be a valid positive whole number		
Home Equity	53	53	Data Gap	Foreclosure Status	Foreclosure Status – Identifies the current foreclosure status as of the end of the reporting month. • In foreclosure, pre-sale – Coded for any mortgage that has been referred to an attorney for loss mitigation proceedings but has not yet gone to foreclosure sale. • Post-sale Foreclosure – Coded for any loan where the bank has obtained title at foreclosure sale, but the property is not yet actively being marketed. Typically this will include loans that are in redemption or being repaired. If this information is not available, please code the loan as REO. • REO – Coded for any mortgage where the bank has obtained title at foreclosure sale and the property is on the market and available for sale. Also code instances where the bank has obtained title but the availability for sale is not known. 0 = Not in foreclosure 1 = In foreclosure, pre-sale 2 = Post-sale foreclosure, Redemption, non-REO (if available, otherwise REO) 3 = REO	Fields needed to calculate Delinquency Status must be populated		
Home Equity	106	75	Edit Check In Question	Loan Extension	Loan Extension must be "Y", "N" for loans and blank for lines of credit, and "N" for Modifications with Term Extensions		Per discussion with LPS, this is a problem with the edit report logic	Resolve logic issue

Home Equity	47	47.2	Data Gap	Loan Status (MBA method)	Status of borrower payments (Current, 30, 60, 90 etc.) of loan. PLEASE NOTE: Indicators of Foreclosure, Bankruptcy and REO are also carried in this field. Note: The code value of T=Terminated Reporting is intended to keep track of loans which were part of the previous month's submission, and no longer available in current month's file. Such missing loans which are neither paid off nor liquidated in the current month will be captured by this code. As an example, if a loan has been sent to a collections agency in the reporting period, but not charged off or transferred to other servicer, it would be captured under this code value. In the case of loan which has been charged off and not moved to REO, the following codes will apply - Liquidation Status (Field #54) will have a code value of 2: involuntary liquidation, which includes charge off. C = Current 3 = 30 days 6 = 60 days 9 = 90+ days F = FC R = REO T = Terminated Reporting S = Servicing Sold Release O = Paid off U = Unknown	Loan Status MBA must coincide with Next Payment Due Date and Status Codes		
Home Equity	199	11	Data Gap	Original Backend DTI	Original Backend DTI must be a valid positive whole number		These are old loans or loans serviced by others that we do not have the orig DTI on and are mostly loans acquired by merger, conversion, etc.	Increase tolerances for loans originated more than 5 years ago
Home Equity	9	9	Data Gap	Original Combined LTV	Original Combined LTV – The original combined loan-to-value (LTV) ratio is the original amount of the home equity loan (or credit line), in addition to any senior liens, divided by the property value at the time of loan origination. The committed loan amount (considering all senior liens and the subject loan) divided by the property value at the time of the HE origination.	Original CLTV must be greater than 0 and less than 1000%		
Home Equity	201	13	Data Gap	Original FICO	Original FICO must be a valid whole number between 300 and 899		These are old loans or loans serviced by others that we do not have the orig FICO on and are mostly loans acquired by merger, conversion, etc.	Increase tolerances for loans originated more than 5 years ago
Home Equity	6	6	Data Gap	Original Loan Amount	Original Loan Amount - The dollar amount of the funds disbursed to the borrower at the time of loan closing. Amount of loan rounded to the nearest whole dollar. Report the dollar amount of the funds disbursed to the borrower at the time of loan closing. This data should be available either in BHCs' loan origination systems or loan servicing systems, and must be populated.	Original Loan Amount or Original Loan / Line Amount must be a valid whole number greater than or equal to 0		
Home Equity	196	8	Data Gap	Original Property Value	Original Property Value must be a valid positive whole number		These are old loans or loans serviced by others that we do not have the orig value on and are mostly loans acquired by merger, conversion, etc.	Increase tolerances for loans originated more than 5 years ago
Home Equity	213	44	Edit Check In Question	Principal Balance	Principal Balance must be a valid whole number greater than or equal to -500		Edit tolerance is only .01% . It is not uncommon to have loans that have a negative balance less than -500 in the process of being refunded to customer. These represent over-payments in the normal course of business.	Establish higher threshold that recognizes the justification (see comment).

Home Equity	84	84	Data Gap	Remaining Term	Report the remaining term of the loan in months. For HELOC it should be the combined draw period and the repayment period. Note: For the Remaining Term fields in the FR Y-14M First Lien and Home Equity schedules, a value of 0 should be assigned if a loan is past maturity.	Remaining Term must be a number between 0 and 600 or 999		
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Schedule	Field Number	Edit Number	Edit Check Issue	Technical Field Name	Edit Test	Error Message Display	Justification / Explanation	Recommendations
First Lien	245	4	Edit Check In Question	Property State	Property State Must Be A Valid Postal Abbreviation of the 50 States, DC, or valid US Possession		Edit tolerance is only .01% which is very hard to achieve do to some manual entry. It is corrected each month.	Establish higher threshold that recognizes the justification (see comment).
First Lien	246	5	Edit Check In Question	Property ZIP Code	Property ZIP Code Should Be 5 Digits		Edit tolerance is only .01% which is very hard to achieve do to some manual entry. It is corrected each month.	Establish higher threshold that recognizes the justification (see comment).
First Lien	6	6.3	Edit Check In Question	Original Loan Amount	Original Loan Amount - The dollar amount of the funds disbursed to the borrower at the time of loan closing. Amount of loan rounded to the nearest whole dollar.	Original Loan Amount must be a valid positive whole number		Establish threshold that recognizes acquired or missing data
First Lien	8	8.1	Edit Check In Question	Original LTV	Original LTV – The original loan-to-value (LTV) ratio is the original loan amount divided by the lesser of the selling price or the appraised value of the property securing the mortgage at origination.	Loan is not a HARP loan and calculated original LTV is greater than or equal to 125%		Establish threshold that recognizes acquired or missing data
First Lien	250	13	Edit Check In Question	Original FICO	Original FICO must be a valid whole number between 300 and 899		These are primarily converted accounts where this information was not available on the legacy system.	Increase tolerances for loans originated more than 5 years ago
First Lien	19	19.3	Edit Check In Question	Product Type - Current	Product type – Identifies the product type of the mortgage including the interest type, amortization term and initial fixed period for hybrid products. Fixed 30 – Fixed rate amortizing loans with a 30 year loan term. Also include fixed rate loans where loan term is greater than 20 and less than 30 years. Fixed 20 – Fixed rate amortizing loans with a 20 year loan term. Also include fixed rate loans where loan term is greater than 15 and less than 20 years. Fixed 15 – Fixed rate amortizing loans with a 15 year loan term. Also include fixed rate loans where loan term is greater than 10 and less than 15 years. Fixed 10 – Fixed rate amortizing loans with a 10 year loan term. Also include fixed rate loans where loan term is less than 10 years. Fixed 40 – Fixed rate amortizing loans with a 40 year term. Also include fixed rate loans where loan term is greater than 30 and less than 40 years. Fixed Greater than 40 - Fixed rate loans with loan term greater than 40 years. Fixed Other – Fixed rate loan where the	Product Type Other cannot exceed 5% of reported loans		Establish threshold that recognizes acquired or missing data
First Lien	273	20.1	Edit Check In Question	Purpose of Loan	Purpose of Loan coded Unknown cannot exceed 5% of reported portfolio loans		These are primarily converted accts where this information was not available on the legacy system. Research is underway to determine if additional data can be used to lower the unknown category.	Increase tolerances for loans originated more than 5 years ago
First Lien	274	21.1	Edit Check In Question	Number of Units	Number of Units coded Unknown cannot exceed 5% of reported portfolio loans		These are primarily loans where we can not determine the number of units as defined by the instructions. There are also old loans where no information is available to determine number of units.	Increase tolerances for loans originated more than 5 years ago
First Lien	22	22	Edit Check In Question	Mortgage Insurance Coverage Percent at Origination	For loans with loan level mortgage insurance coverage, provide the mortgage insurance coverage percent at origination.	MI Coverage Percent At Origination should be between 1% and 50%		Establish threshold that recognizes acquired or missing data
First Lien	23	23.1	Edit Check In Question	Property Type	Indicate the type of the property. 1 = SFR 2 = Condo 3 = Co-Op 4 = 2-4 Units 5 = Townhouse 6 = PUD 7 = 5+ Units E = Commercial F = Mixed Use M = Manufactured Housing Z = Other U = Unknown	Property type cannot change unless it was "U" or not provided	Property Type can change through the life of a loan as a result of coding clean-up/correction	Establish threshold that recognizes the justification (see comment).

First Lien	27	27.1	Edit Check In Question	Interest Only at Origination	Interest Only at Origination Flag - Indicates if the loan was an IO loan at the time of origination. That is, at origination, was the normal monthly payment for the loan just interest. An interest only (IO) mortgage is a nontraditional mortgage which allows the borrower to pay only the interest due on the loan for a specified number of years, and whose interest rate may fluctuate or be fixed. After the interest-only period, the rate may be fixed or fluctuate based on the prescribed index, with payments including both principal and interest.	Interest Only At Origination cannot change unless it was "U" or not provided	"Interest Only At Origination" can change through the life of a loan as a result of coding clean-up/correction	Establish threshold that recognizes the justification (see comment).
First Lien	258	37	Edit Check In Question	ARM Lifetime Rate Cap	ARM Lifetime Rate Cap must be a number between 0.00001 and 0.99999 when loan is an ARM loan		A number of our ARM loans do not have a Lifetime Rate Cap.	Allow for blanks in this variable
First Lien	259	38	Edit Check In Question	ARM Lifetime Rate Floor	ARM Lifetime Rate Floor must be a number between 0.00001 and 0.99999 when loan is an ARM loan		A number of our ARM loans do not have a Lifetime Rate Floor.	Allow for blanks in this variable
First Lien	56	56	Edit Check In Question	Current Interest Rate	Current Interest Rate – The annual percentage rate of the mortgage as of the last day of the reporting month.	Current Interest Rate must be a number between 0.00001 and 0.24999	Interest Rates may exist that does not fall within this guideline (non-accrual rates, promotional rates, etc.)	Establish threshold that recognizes the justification (see comment).
First Lien	96	58	Edit Check In Question	Scheduled Principal Balance Amount	Scheduled Principal Balance Amount must be a valid positive whole number		This edit does not allow for zero scheduled principal balances, which are valid if a loan is past maturity.	Modify edit to allow for zeros if the remaining term is 0.
First Lien	65	65.1	Data Gap	Foreclosure Status	Foreclosure Status – Identifies the current foreclosure status as of the end of the reporting month. • In foreclosure, pre-sale – Coded for any mortgage that has been referred to an attorney for loss mitigation proceedings but has not yet gone to foreclosure sale. • Post-sale Foreclosure – Coded for any loan where the bank has obtained title at foreclosure sale, but the property is not yet actively being marketed. Typically this will include loans that are in redemption or being repaired. If this information is not available, please code the loan as REO. • REO – Coded for any mortgage where the bank has obtained title at foreclosure sale and the property is on the market and available for sale. Also code instances where the bank has obtained title but the availability for sale is not known.	Loan in Foreclosure should not be current		